

LOCAL MEMBER OBJECTION

COMMITTEE DATE: 15/03/2018

APPLICATION No. **18/00034/MNR** APPLICATION DATE: 11/01/2018

ED: **CANTON**

APP: TYPE: Full Planning Permission

APPLICANT: SPL TA HOLDINGS LTD
LOCATION: 105 ROMILLY ROAD, CANTON, CARDIFF, CF5 1FN
PROPOSAL: CHANGE OF USE FROM 3 BED DWELLING TO 7 BED HOUSE IN MULTIPLE OCCUPATION AND CONSTRUCT NEW SINGLE STOREY EXTENSION AND DORMER TO LOFT CONVERSION

RECOMMENDATION 1 : That planning permission be **GRANTED** subject to the following conditions :

1. C01 Statutory Time Limit
2. The development shall be carried out in accordance with the following approved plans:
 - 0170200-SPLTA
 - 0170200 - SPLTA

Reason: To ensure satisfactory completion of the development and for the avoidance of doubt in line with the aims of Planning Policy Wales to promote an efficient planning system.

3. Notwithstanding the submitted plans the dormer roof extension hereby approved shall be finished in hanging tile to match those used on the existing building.

Reason : To ensure the external materials harmonise with the existing building in the interests of the visual amenity of the area in accordance with Policy KP5 of the Cardiff Local Development Plan 2006-2026.

4. Prior to the use of the property as a 7 person HMO 7 secured cycle parking spaces shall be provided and shall thereafter be retained and maintained at all times.

Reason: To ensure that secure cycle parking facilities are provided to encourage other modes of transport over the private car in accordance with Policy T5 of the Cardiff Local Development Plan 2006 - 2026.

5. No more than 7 occupants shall reside at the property at any one time.
Reason: To ensure a suitable level of internal and external amenity space is retained for future occupiers to use in accordance with Policy

6. Prior to the use of the property as a 7 person HMO a refuse storage area shall be provided within the curtilage of the property. The refuse storage area shall thereafter be retained and maintained at all times.

Reason: To secure an orderly form of development and to protect the amenities of the area in accordance with Policy W2 of the Cardiff Local Development Plan 2006-2026.

RECOMMENDATION 2 To protect the amenities of occupiers of other premises in the vicinity attention is drawn to the provisions of Section 60 of the Control of Pollution Act 1974 in relation to the control of noise from demolition and construction activities. Further to this the applicant is advised that no noise audible outside the site boundary adjacent to the curtilage of residential property shall be created by construction activities in respect of the implementation of this consent outside the hours of 0800-1800 hours Mondays to Fridays and 0800 - 1300 hours on Saturdays or at any time on Sunday or public holidays. The applicant is also advised to seek approval for any proposed piling operations.

RECOMMENDATION 3: That the applicant be advised that no work should take place on or over the neighbour's land without the neighbour's express consent and this planning approval gives no such rights to undertake works on land outside the applicant's ownership.

1. **DESCRIPTION OF PROPOSED DEVELOPMENT**

- 1.1 This application seeks planning permission to change the use of the property from a C3 Residential dwelling into a 7 person Sui Generis HMO together with the erection of a dormer roof extension and a ground floor rear extension
- 1.2 Internally the property accommodates three en-suite bedrooms and a kitchen/living room on the ground floor; three en-suite bedrooms on the first floor and one en-suite bedroom in the second floor dormer loft conversion.
- 1.3 Externally an amenity space of approximately 60 square metres is provided to the rear of the property.

2. **DESCRIPTION OF SITE**

- 2.1 The site comprises a two storey building located within a terrace of two storey properties within the Canton Ward of Cardiff.

3. **SITE HISTORY**

None

4. **POLICY FRAMEWORK**

4.1 The site lies within a residential area as defined by the proposals map of the Cardiff Local Development Plan 2016.

4.2 **Relevant National Planning Guidance:**

Planning Policy Wales (Edition 8, 2016)
Planning Policy Wales TAN 12: Design
Planning Policy Wales TAN 21: Waste

4.3 **Relevant Cardiff Local Development Plan Policies:**

Policy KP5 : Good Quality and Sustainable Design
Policy KP13 : Responding to Evidenced Social Needs
Policy H5 : Sub-Division or Conversion of Residential Properties
Policy T5 : Managing Transport Impacts
Policy W2 : Provision for Waste Management Facilities in Development

4.4 **Relevant Supplementary Planning Guidance:**

Access, Circulation & Parking Standards (January 2010)
Residential Extensions & Alterations (June 2015)
Houses in Multiple Occupation (HMO's) (October 2016)
Waste Collection and Storage Facilities (October 2016)

Prior to January 2016 the Supplementary Planning Guidance's were approved as supplementary guidance to the City of Cardiff Local Plan (1996). Although the City of Cardiff Local Plan (1996) has recently been superseded by the Cardiff Local Development Plan (2016), the advice contained within the SPG's is pertinent to the assessment of the proposal and remains consistent with the aims of both the Cardiff Local Development Plan Policies and guidance in Planning Policy Wales and are therefore afforded significant weight. Any Supplementary Planning Guidance approved since January 2016 are approved as supplementary guidance to the Cardiff Local Development Plan 2016.

5. **INTERNAL CONSULTEE RESPONSES**

5.1 Waste Management have advised that an increase in the number of habitable rooms will lead to an increase in the production of waste. The landlord/owner should provide additional bins to accommodate this. Waste must also not be stored on the highway.

5.2 Shared Regulatory Services have requested the following condition be imposed and that the owner be made aware of the Control of Pollution Act with respect to noise from construction activities.

Prior to commencement of development a scheme shall be submitted to and approved in writing by the Local Planning Authority to provide that all habitable rooms shall be subject to sound insulation measures to ensure that all such

rooms achieve an internal noise level of 40 dBA Leq 16 hour during the day and 35 dBA Leq 8 hour at night. The submitted scheme shall ensure that habitable rooms subject to sound insulation measures shall be provided with acoustically treated active ventilation units. Each ventilation unit (with air filter in position), by itself or with an integral air supply duct and cowl (or grille), shall be capable of giving variable ventilation rates ranging from –

1) an upper rate of not less than 37 litres per second against a back pressure of 10 newtons per square metre and not less than 31 litres per second against a back pressure of 30 newtons per square metre, to

2) a lower rate of between 10 and 17 litres per second against zero back pressure.

No habitable room shall be occupied until the approved sound insulation and ventilation measures have been installed in that room. Any private open space (excepting terraces or balconies to any apartment) shall be designed to provide an area which is at least 50% of the area for sitting out where the maximum day time noise level does not exceed 55 dBA Leq 16 hour [free field].

Reason: To ensure that the amenities of future occupiers are protected.

6. **EXTERNAL CONSULTEE RESPONSES**

- 6.1 South Wales Police have been consulted and have raised no objection to this application.

7. **REPRESENTATIONS**

- 7.1 Neighbours have been notified and over 20 objections have been received from neighbouring occupiers and residents living in Presylfa Street opposite. Some objections have been individually submitted and some are in the form of a generic letter of objection. A summary of the objections is as follows:

1. Increased waste as a result of the change of use resulting in the possibility of 14 wheelie bins being stored at the property;
2. Parking issues associated with the use and the potential for 7, possibly 14 occupants if the rooms are double, to park in an already heavily parked area;
3. Noise disturbance resulting from multiple occupancy;
4. Altercations between residents and neighbours as HMO's are likely to lead to anti-social behaviour;
5. The change in the character of the area which is predominantly family homes and flats;
6. The living space for occupiers is inadequate as only one kitchen is provided. This may lead to people cooking in their bedrooms posing a significant risk to health and safety of occupiers and neighbours;
7. Lack of fire protection facilities;
8. Inadequate amenity space;
9. No rear access to the property will make it difficult for the provision of 7 cycle parking spaces;
10. Non compliance with Planning Policy and Policy H5 of the Cardiff Local Development Plans which relates to the sub division or conversion of residential properties;

11. Security issues if the rear access is re-opened;
12. Lack of privacy from the rear dormer roof extension;
13. Work has already commenced before planning permission has been granted.

7.2. Councillors Cunnah, Elsmore and Patel object to this application for the following reasons:

We believe the proposed change of use from a single family dwelling to an HMO is out-of-keeping with Romilly Road and surrounding streets in Canton, which are predominantly family homes.

With regard to the potential to cause problems, we believe the proposed change of use is likely to create pressure on on-street parking and waste collection, to the detriment of current residents. If fully occupied the HMO will have a minimum of seven residents – potentially more if any of the seven rooms are occupied by more than one person. HMOs naturally differ from family dwellings in both the density of residents, but also the fact that the seven residents are more likely to be adults of working age in need of their own transport and with their own separate utilities and waste.

It appears highly likely there will be an increase in the number of vehicles parking on the street, at a time when parking spaces are already at a premium. Even if the issuing of new Residential Parking permits is restricted for the new residents at 105 Romilly Road, these new residents will park on unreserved spaces on the same street or nearby. In addition, with seven new residents, there is a strong likelihood of an increased number of visitors to the street, who may also require on-street parking. This concern is particularly exacerbated with regard to the nature of Romilly Road. Romilly Road is busy at all times, being a through road and on a bus route, as well as accommodating Thompson Park and the people who visit the park.

Also, the collection of waste from seven separate residents appears likely to cause problems with an increased amount of waste and storage difficulties which may result in refuse being left on the street. This may be due to insufficient space in the bins/bags provided, waste not being collected due to it being left in the wrong bin or bag, or waste collection dates being missed.

If the planning permission is granted, we would request that a contribution be made by the applicant to increase residential parking on Romilly Road and surrounding streets from 50% to 75%, and also that adequate provision be made to store cycles at the property.

8. **ANALYSIS**

8.1 This application seeks planning permission to erect a ground floor rear extension and a dormer roof extension to facilitate the change the use of a C3 residential dwelling into a Sui Generis 7 person House in Multiple Occupancy (HMO).

- 8.2 In respect of the dormer roof extension and the ground floor rear extension these are considered acceptable in regards to their scale and design and will provide subservient additions to the dwelling and will not prejudice the general character of the area. The dormer as originally submitted proposed grey welded rubber cladding for the side walls however the applicant has been advised that materials must match the existing roof and condition 3 has been imposed accordingly. The scale of the dormer roof extension and the ground floor rear extension and their relationship with the existing dwelling and that of neighbouring properties is considered acceptable and it is not considered that they would be overbearing or generally un-neighbourly which would justify concern for the Local Planning Authority. It should also be noted that as the property is presently a C3 residential dwelling it therefore benefits from Permitted Development rights and in this respect both the dormer roof extension and ground floor rear extension could be built without the need for Planning Permission.
- 8.3 With respect to the use, as the property is to be occupied by 7 persons such a use would be considered to be classed as *Sui Generis* in that the use does not fall into any use category. As such the main issue for this application is the impact the change of use of a C3 residential dwelling into a 7 person HMO will have on the character of the area and the surrounding neighbouring properties.
- 8.4 The approved Supplementary Planning Guidance on HMO's aims to provide background information on, and provide a rationale for how the council will assess applications for planning permission to create new C4 and *Sui Generis* HMOs. It aims to identify the threshold at which it is deemed that the concentration of HMOs in an area has reached a level considered to adversely impact upon the community. It is recognised that HMOs can provide an important source of housing, and it is recognised that demographic change has driven many of the changes that have seen traditional family homes become HMOs. HMOs are popular accommodation source for many groups, including students, young professionals, migrant workers and often people on lower incomes.

However, in spite of the above, concentrations of HMOs, clustered in small geographical areas can detract from the character of the area and actively contribute towards a number of perceived problems, including, but not limited to, those listed below. It is considered that this may conflict with policy KP13 of the LDP which aims to improve the quality of life for all.

- Increased population density, leading to greater demand for infrastructure, such as waste collections and on-street parking.
- Higher proportion of transient residents, potentially leading to less community cohesion, undermining existing community facilities
- Areas of higher HMO concentrations becoming less popular with local residents, with many properties taken out of the owner-occupier market.
- A proliferation of properties vacant at certain points of the year
- Subsequent impact on crime, local centre viability, as a result of the number of properties temporarily vacant for long periods.

Having identified some of the issues caused by HMOs it is necessary to

determine the threshold at which new HMOs may cause harm to a local area. This threshold will resist further HMOs in communities that already have a concentration above this limit, while also controlling the growth of HMOs in communities below this threshold. A two-tier threshold will therefore be applied to determine when an area has reached the point at which further HMOs would cause harm. In Cathays and Plasnewydd the figure of 20% is to be applied' and in all other wards, the figure of 10% is to be applied.

This means that within Cathays or Plasnewydd, if more than 20% of the dwellings within a 50m radius of the proposed HMO are already established HMOs (i.e. either C4 or sui generis in Planning terms) then this development would be considered unacceptable. In other wards the figure would be 10%.

Having regard to the "cumulative impact" of such conversions, in respect of this application, an analysis has been made on the extent of HMO's (including those defined as such under Sections 254 to 259 of the Housing Act 2004 and those covered under the Additional Licensing Scheme which operates within the Cathays and Plasnewydd Wards of Cardiff) against the threshold limits identified above. As the application site is located within the Canton Ward of Cardiff a 10% threshold limit will be relevant and having undertaken such checks within 50m of the application site it was found that there were no properties registered as HMO's within 50m of the application site which equates to 0%.

- 8.5 It should also be noted that two recent planning applications which the council refused were allowed on appeal to the Planning Inspectorate for the change of use of a C3 residential dwelling into a C4 HMO (14 Llandough Street) and the change of use of a C3 residential dwelling into a 7 person Sui Generis HMO (74 Daniel Street).

The Planning Inspector who considered the appeal at 14 Llandough Street advised that :

"Policy H5 of the Cardiff Local Development Plan (LDP) permits HMO conversions subject to a number of criteria, the most relevant in this case being that the cumulative impact of such conversions should not adversely affect the amenity and/or character of the area. There is generally no dispute that the proposal would comply with the other criteria relating to residential amenity standards, neighbouring amenity and parking provision, and I do not disagree. LDP Policy KP5 is also relevant insofar as it seeks good quality and sustainable design by, amongst other things, providing a diversity of land uses to create balanced communities. The Council's adopted Supplementary Planning Guidance (SPG) on HMOs provides background information on the issues associated with HMOs, which include a high proportion of transient residents potentially leading to less community cohesion and greater demands on social, community and physical infrastructure. The SPG has been subject to public consultation and is adopted, and it is therefore an important material consideration.

There is no substantiated evidence that directly links the proposal to any

significant loss of community cohesion or character, which is already largely determined by the existing concentrations of HMOs in this particular location. The proposal would not materially change the number of transient residents living in the immediate area, and any infrastructural requirements arising from the proposal would be localised, and diluted in the light of existing demands. Although the SPG stipulates a threshold of 20% within a 50 metre radius, because the existing concentration of HMOs already significantly exceeds this, there would be no fundamental change to the existing community balance in this particular part of the Ward.

The SPG indicates that some 58% of properties in the Cathays Ward are in HMO use. Relative to the immediate environment of the appeal site, this suggests that there is a more balanced mix of housing in the Ward as a whole. 'Area' is not defined in the context of LDP Policy H5 however the character and nature of an Electoral Ward will usually vary across it. In this instance, because the appeal property is contained within a dense pocket of HMOs, the effects on the local community, cumulatively or otherwise would not be significant. In other parts of the Cathays Ward or the City, it would be open to the Council to demonstrate in the particular circumstances of an individual case that harm would be caused.

I acknowledge that changes to the Use Classes Order sought to address problems associated with high concentrations of HMOs. Nonetheless, each area has its own particular set of circumstances, and my duty is to determine this appeal on its merits in the light of the development plan.

I also note the comments received from the Police. However the evidence of crime relates to a wide area and there is little to suggest that the proposal would directly contribute to any material increase in the risk to personal safety or property, especially in the context of this dense residential environment.

I conclude that, whilst the development would not comply with the threshold set out in the SPG, there would be no significant adverse effects on the amenity and / or character of the area, cumulatively or otherwise."

The Planning Inspector who considered the appeal at 74 Daniel Street advised that :

The appeal property is a terrace house in an accessible location close to a busy shopping area and other facilities in Crwys Road. Daniel Street itself contains generally well maintained houses, and has a pleasant ambience with little physical evidence of any significant environmental problems often associated with very high concentrations of HMOs. In particular, there is little indication of poor waste management practices or poorly maintained frontages, and there is nothing to suggest that existing residents are experiencing amenity issues related to noise or anti-social behaviour. Evidence from the police suggests that the Cathays Ward has a high incidence of crime generally, and some data is provided for a more localised area around Daniel Street. However this relates to several postcodes, and given the proximity of bars and restaurants on Crwys

Road where incidents are more likely, I have very little information before me to substantiate any significant links between the appeal development and crime or anti-social behaviour.

The Council's concerns as to the effect on local community cohesion and infrastructure are similarly unsubstantiated. The waste collection and pollution control departments have provided no objections to the proposal and given the accessibility of the site and the provision for cycle parking, there would be no serious additional demands placed on local parking facilities. I also have no information to suggest that the long term future of any local community facilities are being jeopardised by the existing concentration of HMOs or that the proposal itself would result in any direct harm to this effect. By their nature, HMOs are likely to result in transient residents, and students in particular will mean empty properties at certain times of the year. Nonetheless, given that the area around the appeal property has a healthy mix of uses, and in the absence of information to suggest otherwise, I have no reason to believe that the proposal would upset the existing community balance or lead to any unacceptable loss of community cohesion.

The Council's Supplementary Planning Guidance (SPG)¹ provides general empirical evidence on the issues associated with high concentrations of HMOs and Welsh Government (WG) research² provides a similar picture. However, none of these problems seem particularly prevalent in the vicinity of the appeal property. There is no dispute that the 20% threshold for HMOs stipulated in the SPG would be breached but in my view it is not sufficient just to say that a breach would occur without demonstrating that harm would be caused. In particular, Policy H5 of the Cardiff Local Development Plan (LDP) permits HMOs providing, amongst other things, the cumulative impact of such conversions will not adversely affect the amenity and/or the character of the area.

From my own observations and on the available evidence, the area around Daniel Street contains a balanced and sustainable mix of housing with good access to a healthy range of services and facilities. I acknowledge the cumulative effects that HMOs can have and I note the English appeal decisions that have been drawn to my attention. However, in the latter cases it was demonstrated that either a community imbalance would occur or existing issues would be worsened. In this case, I have little evidence to suggest that the proposal either by itself or cumulatively would exacerbate any existing problems or result in any material harm to the character and amenity of the area. Moreover, it would be open to the Council to demonstrate in the individual circumstances of any other case that harm would be caused.

There is concern from local representatives as to the amount of amenity space at the property, However, the size of the space falls only marginally short of the Council's standard, and I observed it to be a well laid out feature with sufficient provision for refuse and cycle storage. The property itself also provides a good standard of living and amenity for its future occupiers.

I conclude that the proposal would comply with the objectives of LDP Policy H5.

It would also concur with the aim of LDP Policy KP5 to seek good quality and sustainable design by, amongst other things, providing a diversity of land uses to create balanced communities.

- 8.6 Waste Management have not objected to this application but have recommended that suitable waste and recycling receptacles be provided at the property and in this respect condition 5 has been imposed.
- 8.7 In respect of the comments made by Shared Regulatory Services given that the property is already in use as a C3 residential dwelling it is felt that a condition in respect of road traffic noise would be unreasonable. However Recommendation 2 has been included to bring to the applicant's attention the Control of Pollution Act in respect of noise from construction activities.
- 8.8 The Council's Existing Supplementary Planning Guidance on Access, Circulation and Parking Standards identifies that 1 secured cycle parking space per bedroom is required. As this application seeks planning permission for a seven person HMO then it would be unreasonable to insist that seven cycle parking spaces be provided and in this respect condition 4 has been imposed.
- 8.9 In respect of amenity space approximately 60 square metres will be available for occupiers to use to the rear of the property which is felt is sufficient for a property of this size. It should also be noted that the minimum amenity space requirement as specified in the HMO SPG is 27.5 square metres.
- 8.10 In respect of the comments made by neighbouring occupiers which are not covered above the following should be noted:
1. Waste Management have not objected to this application;
 2. Highways have not objected to this application and as long as 7 cycle parking spaces are provided the proposal will be compliant with planning policy. The rear garden is large enough to comfortably accommodate seven cycle parking spaces whilst leaving a large rear garden for occupiers to use;
 3. If occupiers create a noise nuisance then there is separate Environmental legislation which would cover this;
 4. Anti-social behaviour is a matter for the police;
 5. The proposal is compliant with the SPG on HMO's which seeks to limit the siting of future HMO's to protect and preserve the character of the area;
 6. The proposal is compliant with Licensing standards and issues such as Health and Safety would be covered under Licensing and Building Regulations;
 7. Fire protection is a matter for Licensing and Building Regulations;
 8. The proposal requires 27.5 square metres of amenity space. Over 60 is to be provided which is compliant with the SPG on HMO's;
 9. Most terraced properties do not have a rear access and it is not unusual for occupiers of such properties to take their cycles through the house to the rear garden;

10. It is the Council's opinion that the proposal complies with current Planning Policy and Policy H5 of the Cardiff Local Development Plan which relates to the sub division or conversion of residential properties. This has also been supported by Planning Inspectors as stated in the recent appeal decisions ;
11. The re-opening of the rear access is a civil matter in which the council, as Local Planning Authority, has no powers to intervene. However, the owner has indicated that he is no longer pursuing this course of action;
12. The dormer roof extension is compliant with current planning policy and there is more than 10.5m from the rear elevation of the dormer to the rear boundary;
13. It is not a breach of planning control to undertake refurbishment works to a property or to remove existing outbuildings before planning permission has been granted. Works to the dormer roof extension and ground floor rear extension have not yet commenced.

8.11 In respect of the objections from the local Ward Members and the neighbouring occupiers it should be noted that the proposal is in compliance with the SPG on HMO's and the Cardiff Local Development Plan. As such, and in light of the similarities between this application and the two recent appeal decisions, it would not be appropriate for the Council to resist this application which seeks to change the use of the property from a C3 residential dwelling into a seven person sui generis HMO.

9. **OTHER CONSIDERATIONS**

- 9.1 Crime and Disorder Act 1998 – Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. This duty has been considered in the evaluation of this application. It is considered that there would be no significant or unacceptable increase in crime and disorder as a result of the proposed decision.
- 9.2 Equality Act 2010 – The Equality Act 2010 identifies a number of 'protected characteristics', namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership. The Council's duty under the above Act has been given due consideration in the determination of this application. It is considered that the proposed development does not have any significant implications for, or effect on, persons who share a protected characteristic.
- 9.3 Well-Being of Future Generations Act 2016 – Section 3 of this Act imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principle to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs (Section 5). This duty has been considered in the evaluation of this application. It is considered that there would be no significant or unacceptable impact upon the achievement of wellbeing objectives as a result of the recommended decision.

10. **RECOMMENDATION**

- 10.1 Having taken all of the relevant factors into consideration it is concluded that in this particular instance there are insufficient grounds to refuse this application. It is therefore recommended that planning permission be granted, subject to conditions.



TITLE NUMBER
WA984876



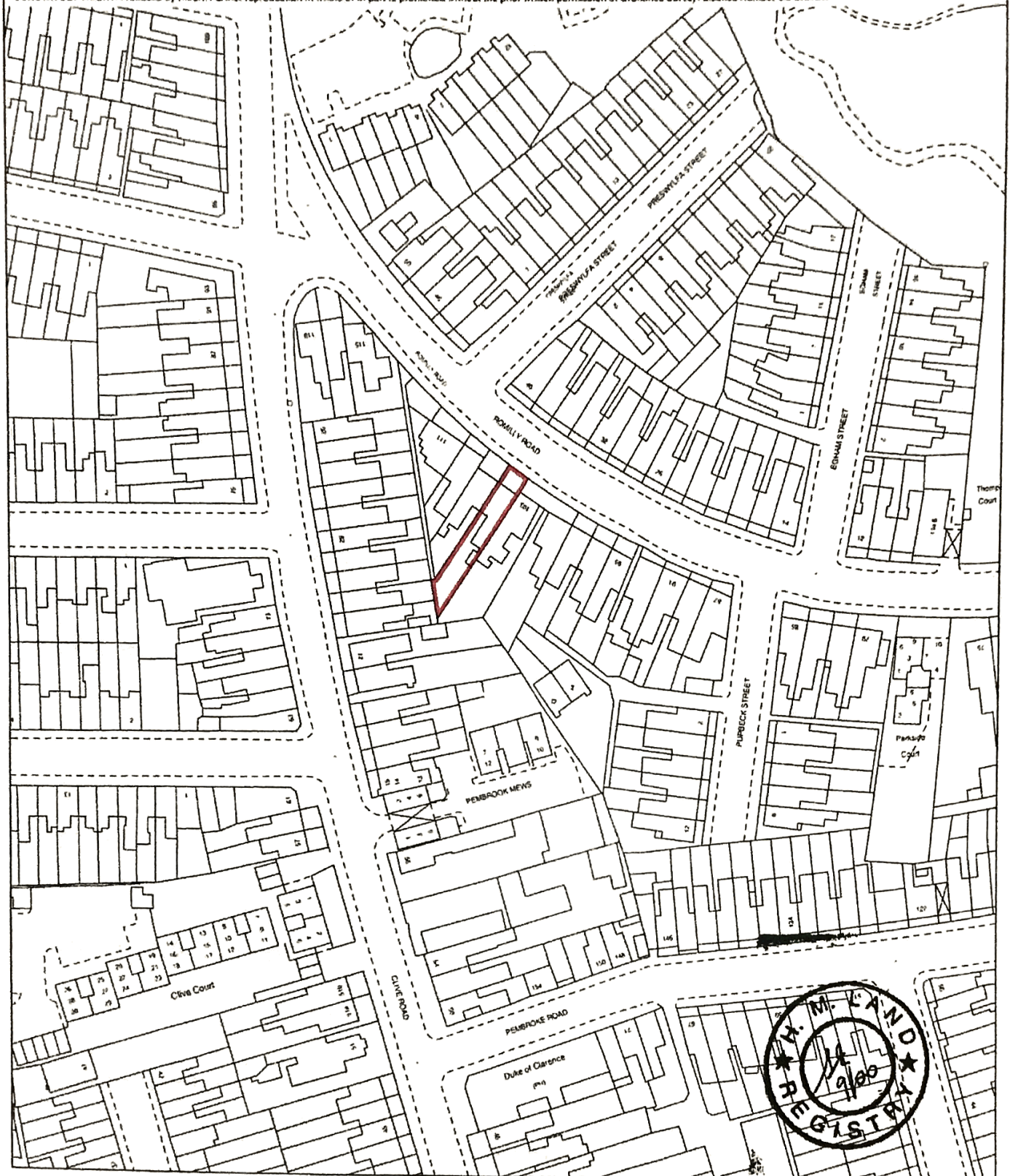
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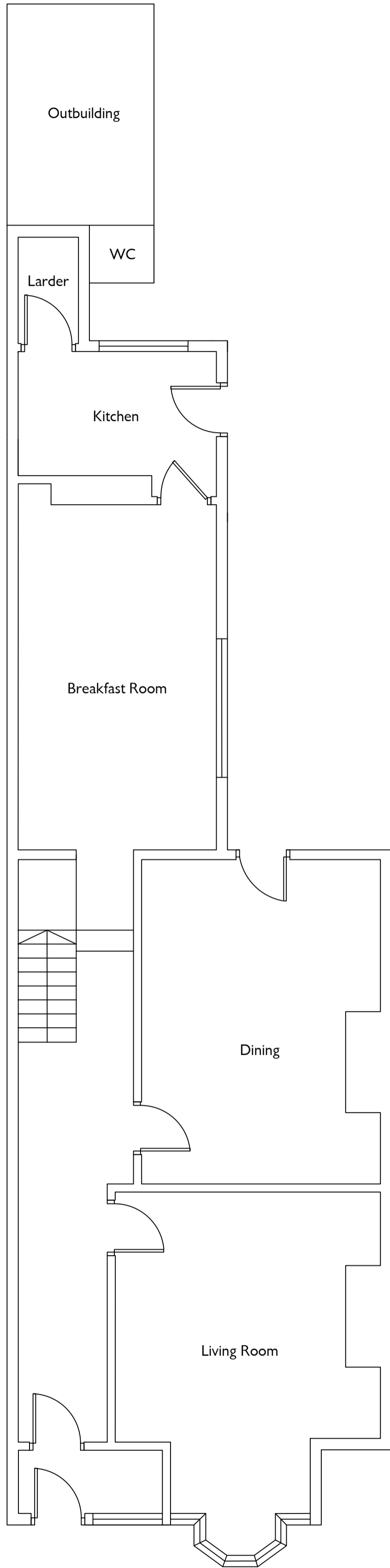
ORDNANCE SURVEY MAP REFERENCE:

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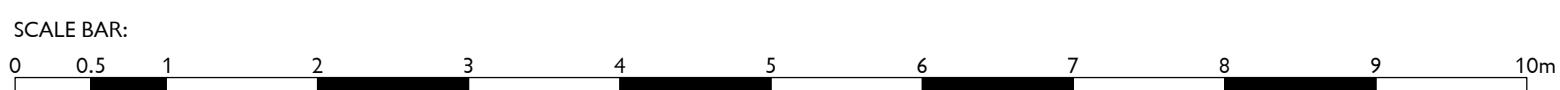




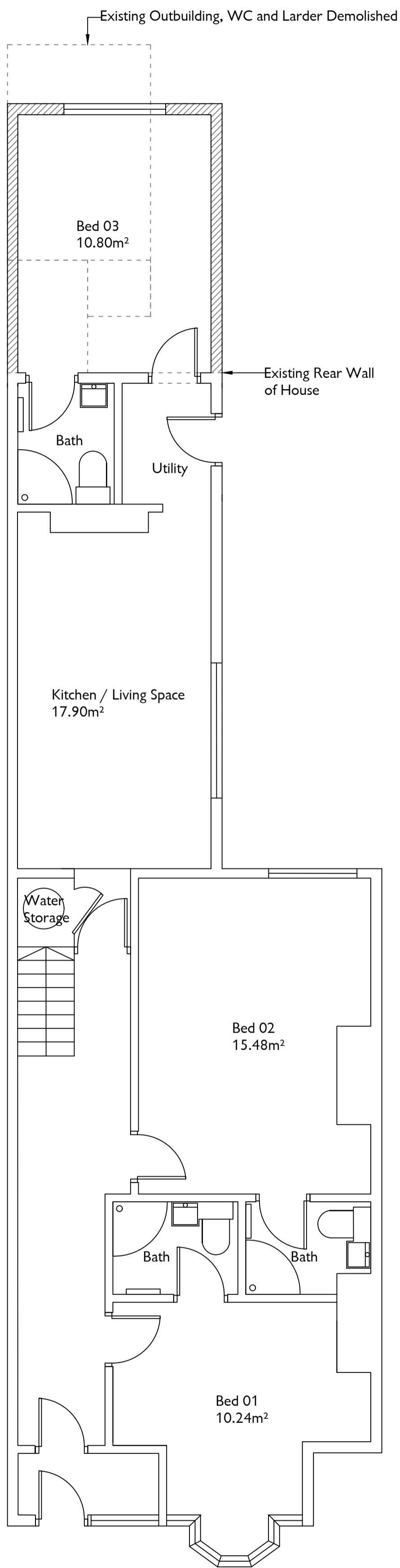
Existing Ground Floor Plan



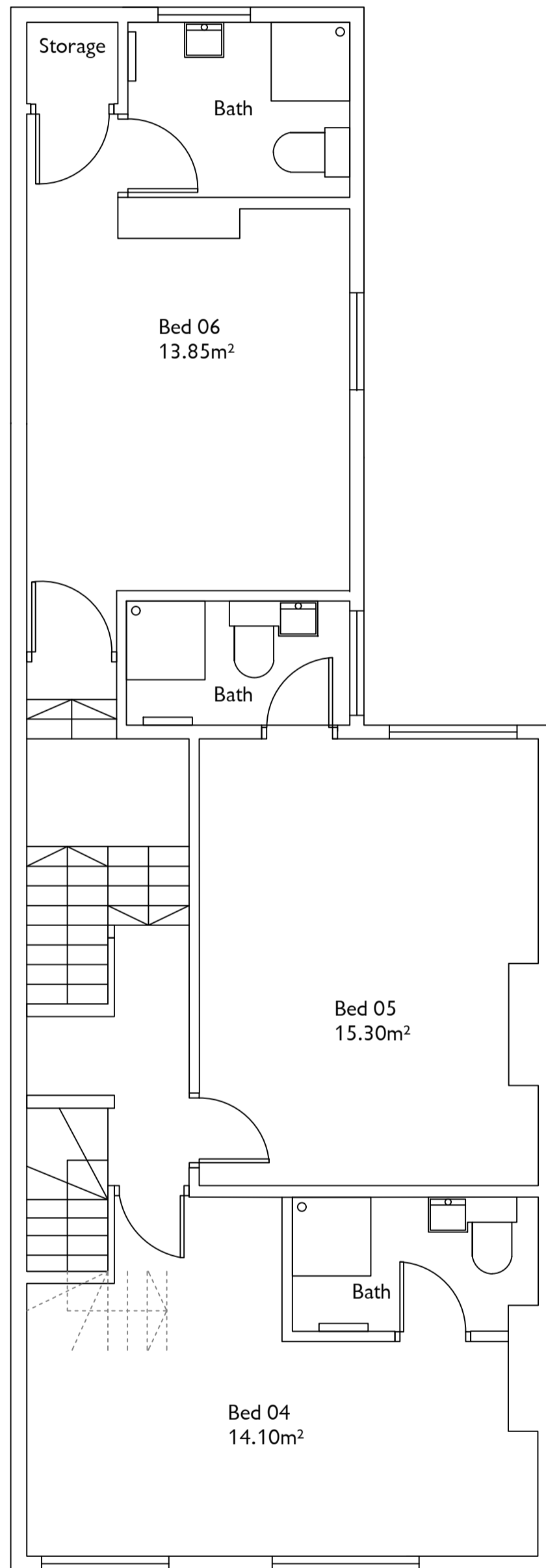
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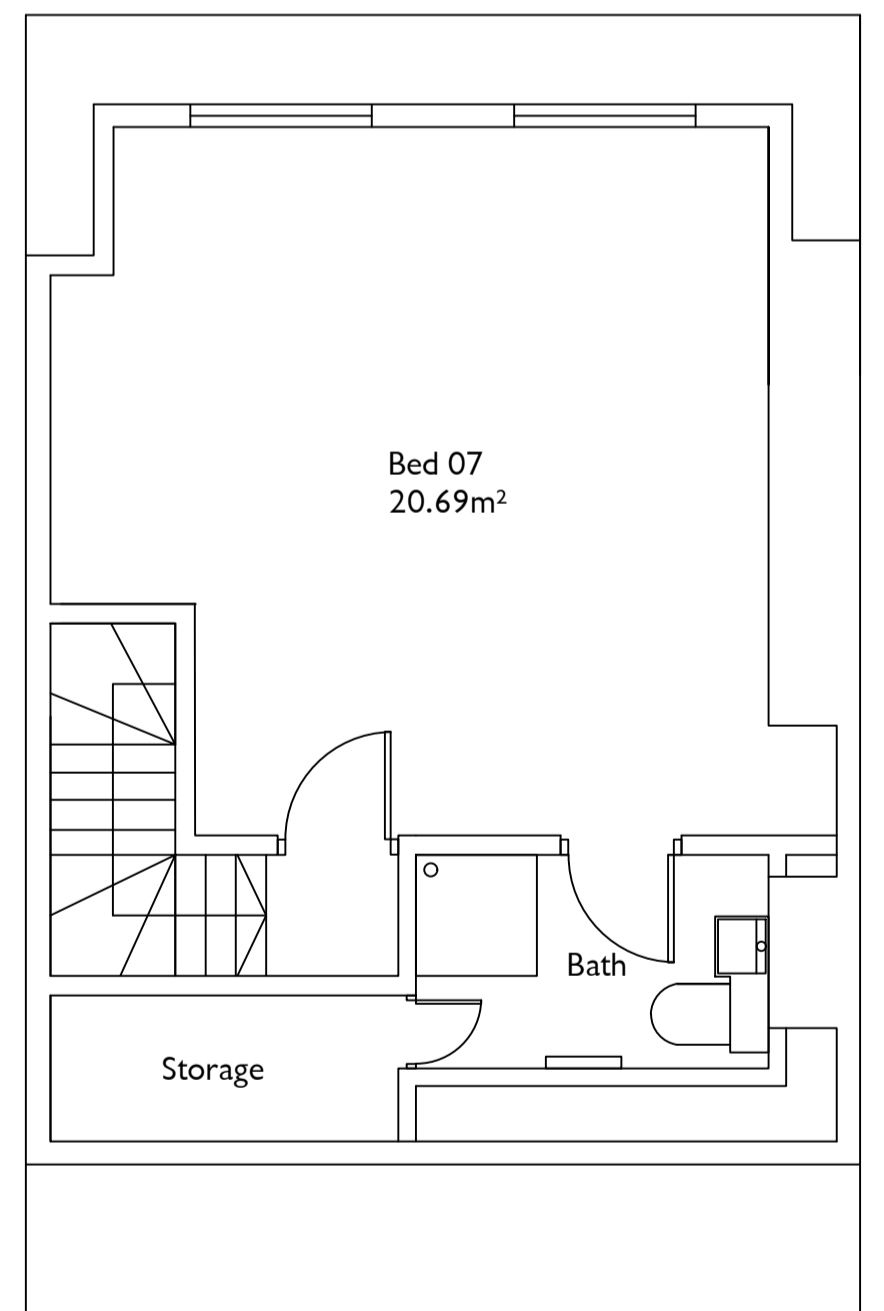
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SPL TA	105 Romilly Road Existing Layout		
o drawing no.	o revision	o scale	o drawn
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<small>SB Project Number Originator Zone Level Type Role Number</small>			o date
			Dec 2017



Proposed Ground Floor Plan



Proposed First Floor Plan



Proposed Second Floor Plan



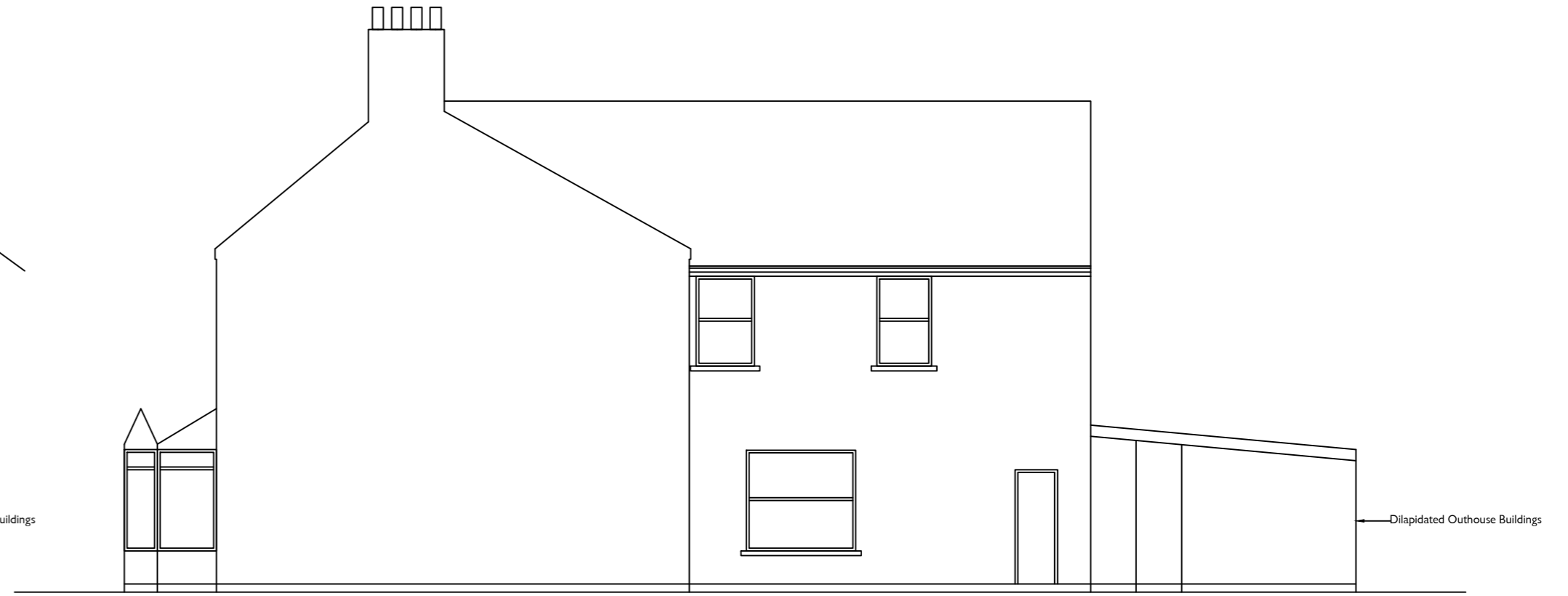
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o drawing no.	o revision	o scale	o drawn
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<small>SB Project Number Originator Zone Level Type Role Number</small>			o date
			Dec 2017



Existing Front Elevation



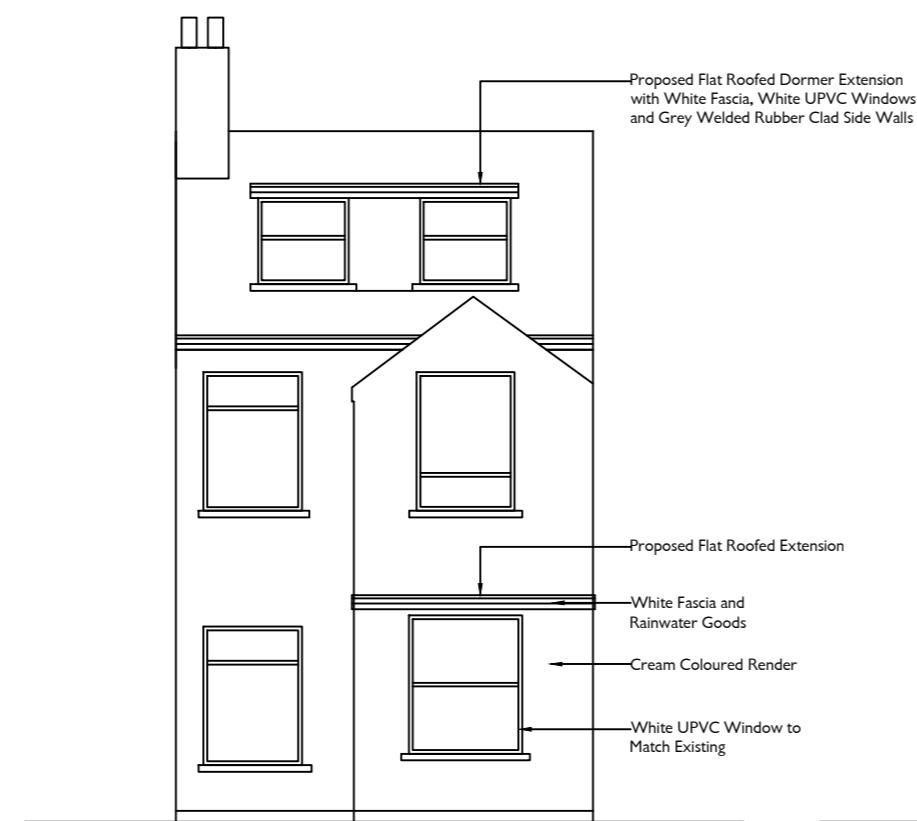
Existing Rear Elevation



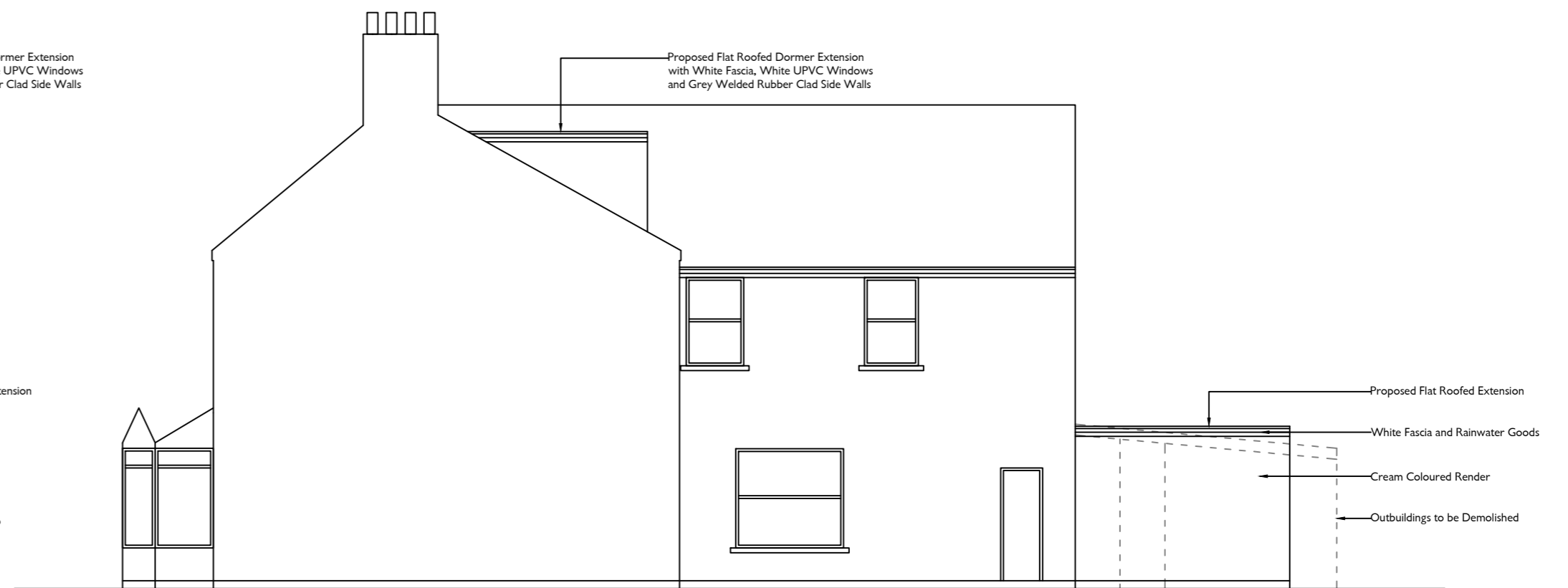
Existing Side Elevation



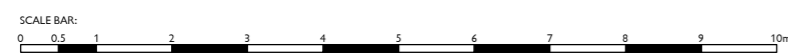
Proposed Front Elevation



Proposed Rear Elevation



Proposed Side Elevation



o client/project	o drawing	
SPL TA	105 Romilly Road Existing and Proposed Elevations	
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SB Project Number	Originator	Zone
Level	Type	Role Number
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