

## MEMBER OBJECTION

COMMITTEE DATE: 10/01/2018

APPLICATION No. **17/02538/MNR** APPLICATION DATE: 26/10/2017

ED: **CATHAYS**

APP: TYPE: Full Planning Permission

APPLICANT: Mr Patel

LOCATION: 70 GELLIGAER STREET, CATHAYS, CARDIFF, CF24 4LB

PROPOSAL: CHANGE OF USE FROM C4 (SIX OCCUPANTS) TO  
HOUSE IN MULTIPLE OCCUPATION SUI GENERIS (SEVEN  
OCCUPANTS)

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RECOMMENDATION: 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:

- A108
- A109
- A110

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. Prior to the use of the property as a 7 person HMO 1 secured cycle parking space 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.

4. 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 KP5 of the Cardiff Local Development Plan 2006 – 2026.

5. 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.

### 1. **DESCRIPTION OF PROPOSED DEVELOPMENT**

- 1.1 This application seeks planning permission to change the use of the property from a C4 HMO (3-6 occupants) to a 7 person Sui Generis HMO
- 1.2 Internally the property accommodates one bedroom, a shower room and a combined kitchen/diner and lounge on the ground; four bedrooms and a toilet on the first floor and two bedrooms and a shower room in the second floor attic conversion.
- 1.3 Externally an amenity space of approximately 43 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 Cathays Ward of Cardiff.

### 3. **SITE HISTORY**

Application No : 17/01172/DCH  
Proposal : REAR DORMER ROOF EXTENSION FOR LOFT CONVERSION, INSERTION OF TWO 2 NO. ROOF LIGHTS AND INTERNAL RENOVATION TO INCREASE OCCUPANTS FROM FOUR (C4) TO SIX (C4).  
Application Type: CLD  
Decision : PER  
Decision Date : 17/07/2017

### 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

#### 4.5 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 the proposal will have little impact on the production of waste and that the current arrangements are sufficient.
- 5.2 Shared Regulatory Services have not objected to this application.

#### 6. **EXTERNAL CONSULTEE RESPONSES**

- 6.1 South Wales Police have been consulted and have objected to this application.

#### 7. **REPRESENTATIONS**

- 7.1 Neighbours have been notified and no objections have been received to this application
- 7.2. Councillors Weaver, Merry and Mackie object to this application for the following reasons:

We believe this application is not in accordance with KP5 of the LDP, the City of Cardiff Council which requires all new HMOs to be high quality, well designed and fit to afford a good quality of life to inhabitants and the surrounding community. The LDP also recognises the cumulative impact of such developments on an area. Paragraph 9.3.3 states: "Insensitive infilling, or the cumulative effects of development or redevelopment, including conversion or adaptation, should not be allowed to damage an area's character or amenity. This includes any such impact neighbouring dwellings, such as serious loss of privacy or overshadowing."

We believe that this application contravenes Cardiff Council's Supplementary Planning Guidance on HMO's adopted in 2016 on the following grounds:

(i) It contravenes section 5.7 which sets up an upper cap on the number of HMO's within a radius of a property, linked to policy H5 of the LDP. The SPG recognises the impact of an over concentration of HMO's in terms of noise, waste, crime and social cohesion and was brought in to address them.

(ii) Section 5.10 of our SPG states: "A property that is already a C4 HMO will not automatically be permitted to become a sui generis HMO. Even though it is already an HMO, if the concentration in the area is high, then by definition, the creation of the larger sui generis HMO will only likely heighten the issues caused by HMOs. As such, C4 to Sui Generis developments will not automatically be considered neutrally or favourably." An increase of one bedroom if agreed and then replicated through the street would significantly affect the noise, waste, crime and social cohesion plus parking issues.

(iii) Section 6.5.2 of the HMO SPG states: "The council's cycle parking standards are set out in the latest Managing Transport Impacts and Parking Standards SPG .The SPG identifies that in HMOs, a minimum of one cycle parking space should be provided for each bedroom." For this application then 7 spaces should be provided. The plans only show 2 places and it is also unclear what the remaining amenity space would be if 7 were provided.

For all these reasons we would wish to object to the application to become a 7 bed sui generis house in multiple occupation.

## 8. **ANALYSIS**

8.1 This application seeks planning permission to change the use of a C4 HMO into a 7 person Sui Generis HMO.

8.2 As 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. Use Class C4 allows for tenanted living accommodation occupied by 3 to 6 people, who are not related and who share one or more basic amenities, as their only or main residence. As such the only issue for this application is the impact the change of use of a 6 person HMO into a 7 person HMO will have on the character of the area and the surrounding neighbouring properties.

8.3 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 Cathays Ward of Cardiff a 20% threshold limit will be relevant and having undertaken such checks within 50m of the application site it was found that there were 41.6% of properties within 50m of the application site listed HMO's.

- 8.4 However, it should be noted that SPG's are guidance and whilst they are a material consideration when making planning decisions they are not the sole planning consideration and other factors may also influence the decision making process. In this respect whilst it is noted that the threshold limit of 20% has been exceeded it should be noted that the application property can lawfully be used as a 6 person HMO at the present time and the proposal will not therefore result in the loss of family accommodation.
- 8.5 It should also be noted that a recent planning application which the Council refused was allowed on appeal to the Planning Inspectorate for the change of use of a C4 HMO to an 8 person sui generis HMO. The Planning Inspector

who considered the appeal at 36 Wyeverne Road advised that :

*“The SPG records the impacts that high concentrations of HMOs clustered in small geographical areas can have. These include a greater demand for infrastructure such as waste collections and on street parking, a higher proportion of private rented housing and transient residents, potentially leading to less community cohesion and undermining community facilities, a proliferation of vacant properties during holiday periods, and an impact on crime. The occurrence of these issues is supported by Welsh Government research and in the Cathays Ward itself the SPG contains empirical data such as incidences of street cleansing enforcement and crime which indicate that these are issues relevant to the local context. Nonetheless, the appeal property is already operating as a HMO, and my assessment of the impact of the proposed development is limited to 2 additional residents.*

*I have had regard to the data in the SPG which purports to show a general link between high concentrations of HMOs and crime and anti-social behaviour. I also note the statistics provided by South Wales Police which relate to incidents in the vicinity of Wyeverne Road specifically. However, I have little information to suggest that an additional 2 residents would materially increase the risk of crime. Whilst pointing to the link between HMOs and crime, South Wales Police have no strong objection to the development and advocate an advisory approach to crime prevention and security measures in this case.*

*The SPG identifies a threshold at which the level of HMOs is deemed to be such that it has a detrimental impact upon the community. In Cathays this is set at 20% within a 50 metre radius of the proposed HMO, and evidence provided by the Council indicates that 72% of the properties surrounding the appeal property are HMOs. As the appeal property is an existing HMO, the proposal would not contribute to the existing breach of the threshold in this case. Nevertheless, paragraph 5.10 of the SPG states that an existing Class C4 HMO will not automatically be permitted to become a sui generis HMO. The SPG explains that this is because if the concentration in the area is high, then by definition a larger HMO use will only likely heighten the issues caused by HMOs. Even so, my assessment against this threshold is again based on the effects that 2 additional residents might have. As the 20% threshold has been significantly exceeded, the character and amenity of the area is already substantially changed, and the impact of 2 additional residents, cumulatively or otherwise, would be negligible.*

*The development would provide adequate living standards for its future occupiers and given the existing concentration of HMOs in the vicinity, it would be unlikely to lead to any significant residential amenity problems such as general disturbance or noise. In addition, provision for cycle parking can be secured by planning condition so that there would be no undue effects on existing parking demand in the area. Moreover, the appeal property is in an accessible and sustainable location close to shops, public transport and other community and recreational facilities. It would make an, albeit minor, contribution to the diversity of land uses in the area and provide a small but important source of housing without upsetting the existing community balance.*

*Having regard to all the evidence that is before me, I conclude that the proposal would not cause any adverse effects on the amenity and/or character of the area, and it would comply with the objectives of LDP Policies H5 and KP5.”*

The Council also recently refused an application to convert a C3 residential dwelling into a 6 person C4 HMO at 14 Llandough Street. This was refused due to the threshold limit being breached and the resultant unacceptable cumulative adverse impact on the amenities of the area. The applicant subsequently appealed this decision and the appeal was allowed and planning permission granted. The Planning Inspector who considered the appeal 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.”*

- 8.6 In respect of the objections from the local Ward Members it should be noted that further to the recent appeal decisions and the fact that the property is already in use as a C4 HMO occupied by 6 occupants it will not therefore result in the loss of family accommodation. As such it is considered that in this particular instance it would not be appropriate for the Council to resist this application which seeks to change the use of the property from a six person C4 HMO into a seven person sui generis HMO.
- 8.7 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.
- 8.8 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 only seeks planning permission for one extra bedroom then it would be unreasonable to insist more than one cycle parking space be provided.
- 8.9 In respect of amenity space approximately 43 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.

## **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

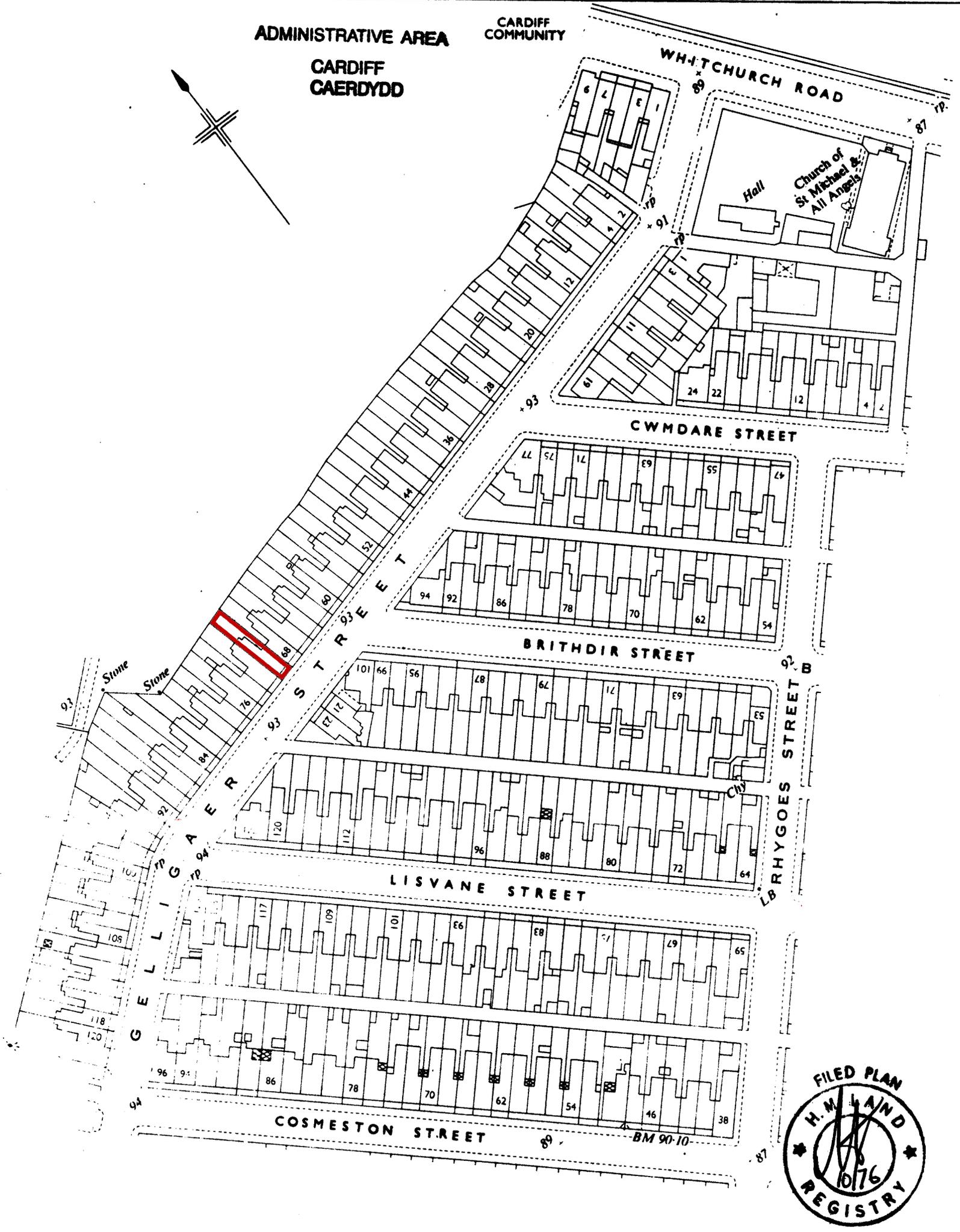
characteristics', namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership. The Council's duty under the above Act has been given due consideration in the determination of this application. It is considered that the proposed development does not have any significant implications for, or effect on, persons who share a protected characteristic.

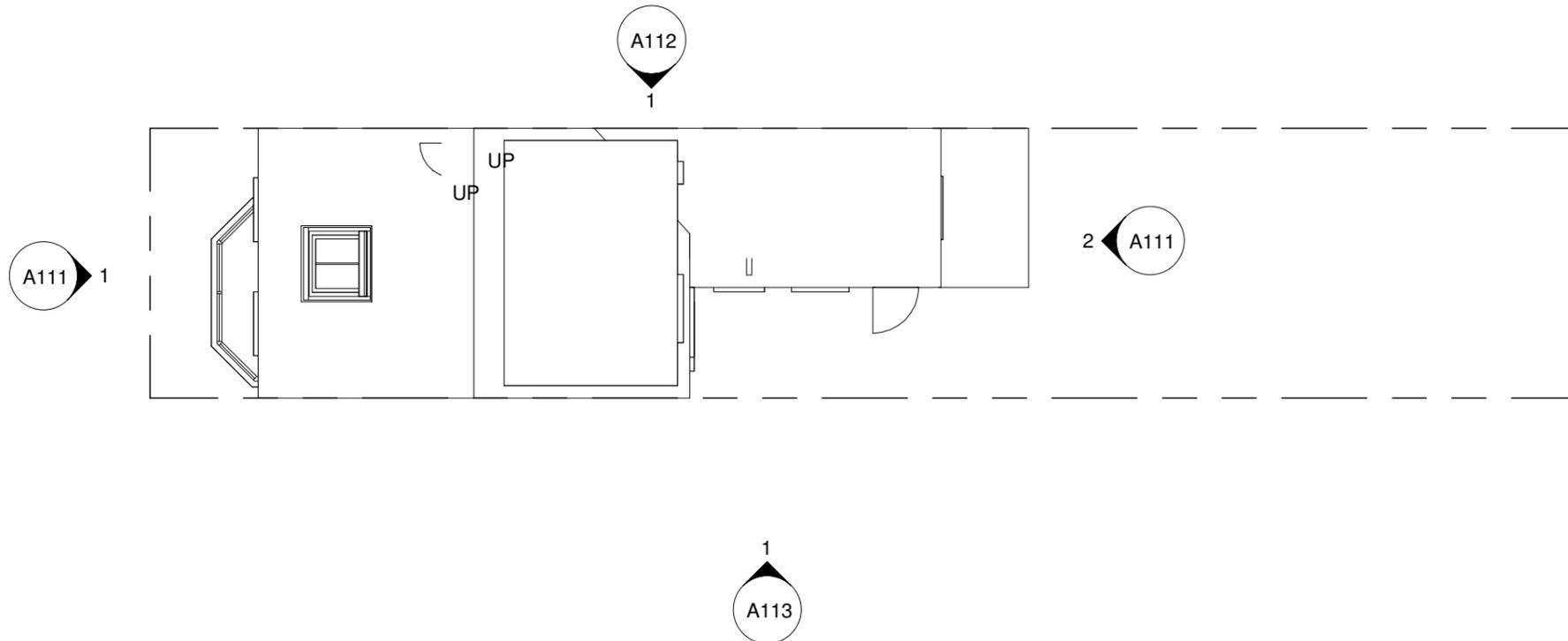
- 9.3 Well-Being of Future Generations Act 2016 – Section 3 of this Act imposes a duty on public bodies to carry out sustainable development in accordance with the sustainable development principle to act in a manner which seeks to ensure that the needs of the present are met without compromising the 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.

<b>H.M. LAND REGISTRY</b>		TITLE NUMBER		
		<b>WA 56560</b>		
ORDNANCE SURVEY PLAN REFERENCE	<del>COUNTY</del>	SHEET	NATIONAL GRID	SECTION
	<del>SOUTH GLAMORGAN</del>		ST 1778	P
Scale: 1/1250	<del>CARDIFF DISTRICT</del>		© Crown Copyright 1968.	





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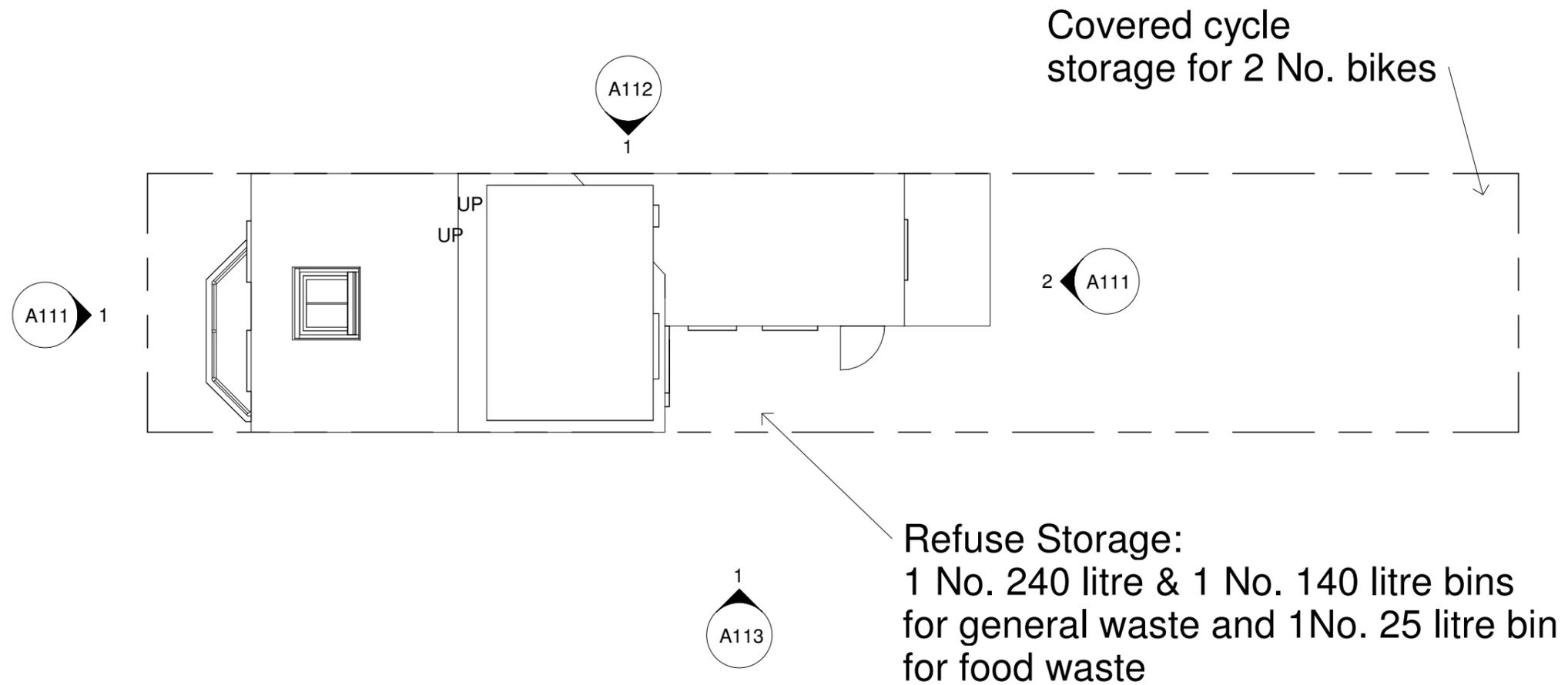
No.	Description	Date

70 Gelligaer Street

Deven Patel

Site Plan As Existing.

Project number	JP70	<b>A107</b>
Date	05.04.17	
Drawn by	John Pinn	
Checked by	N/A	
Scale		1 : 100



**1 Site - Proposed**  
1 : 100

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No.	Description	Date

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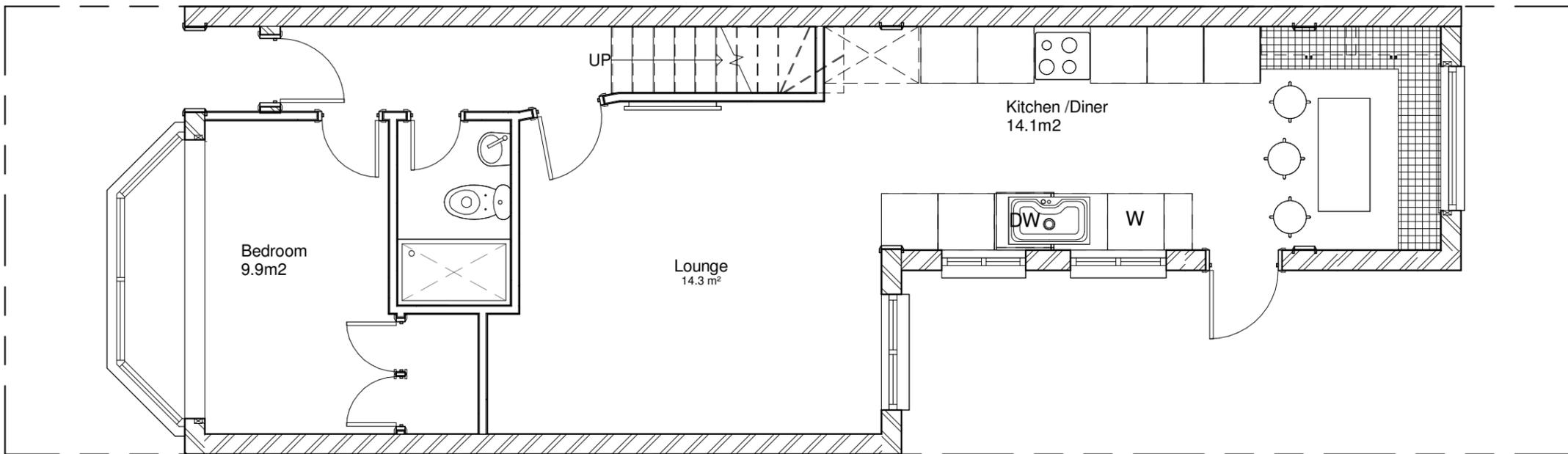
Site Plan As Proposed

Project number	JP70
Date	31.05.17
Drawn by	John Pinn
Checked by	N/A

**A107**

Scale 1 : 100

A112  
1



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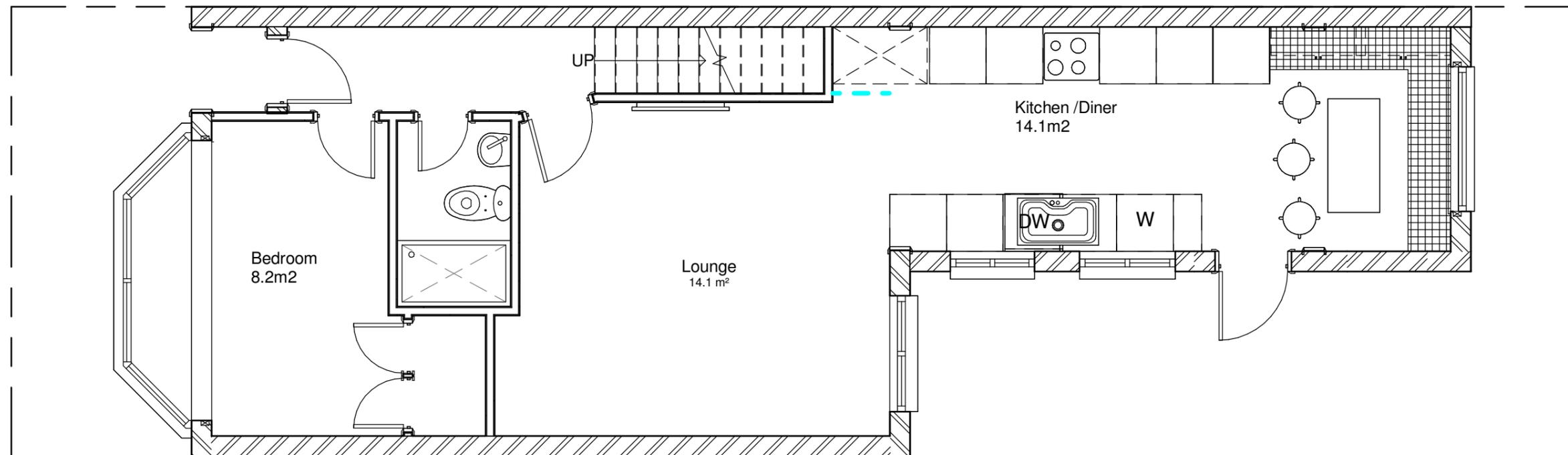
No.	Description	Date

70 Gelligaer Street

Deven Patel

Ground Floor As Existing.		A108
Project number	JP70	
Date	05.04.17	
Drawn by	John Pinn	
Checked by	N/A	
Scale	1 : 50	

A112  
1



**1** 00 - Ground Floor Proposed  
1 : 50

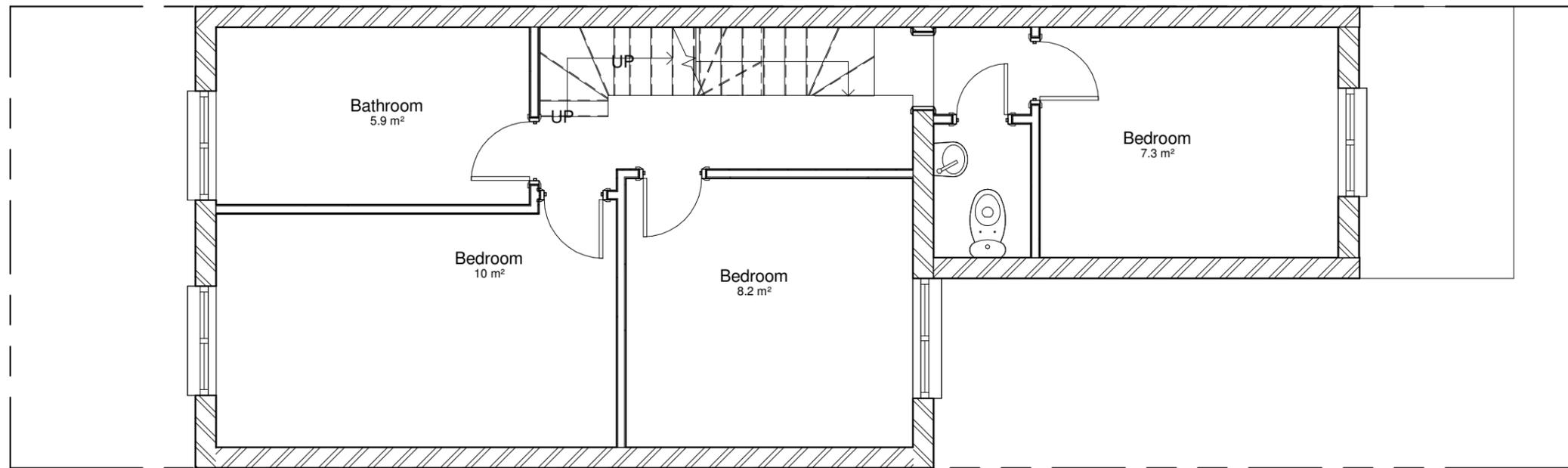
70 Gelligaer Street
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No.	Description	Date

70 Gelligaer Street
Deven Patel

Ground Floor As Proposed		<b>A108</b>
Project number	JP70	
Date	31.05.17	
Drawn by	John Pinn	
Checked by	N/A	Scale 1 : 50

A112  
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No.	Description	Date

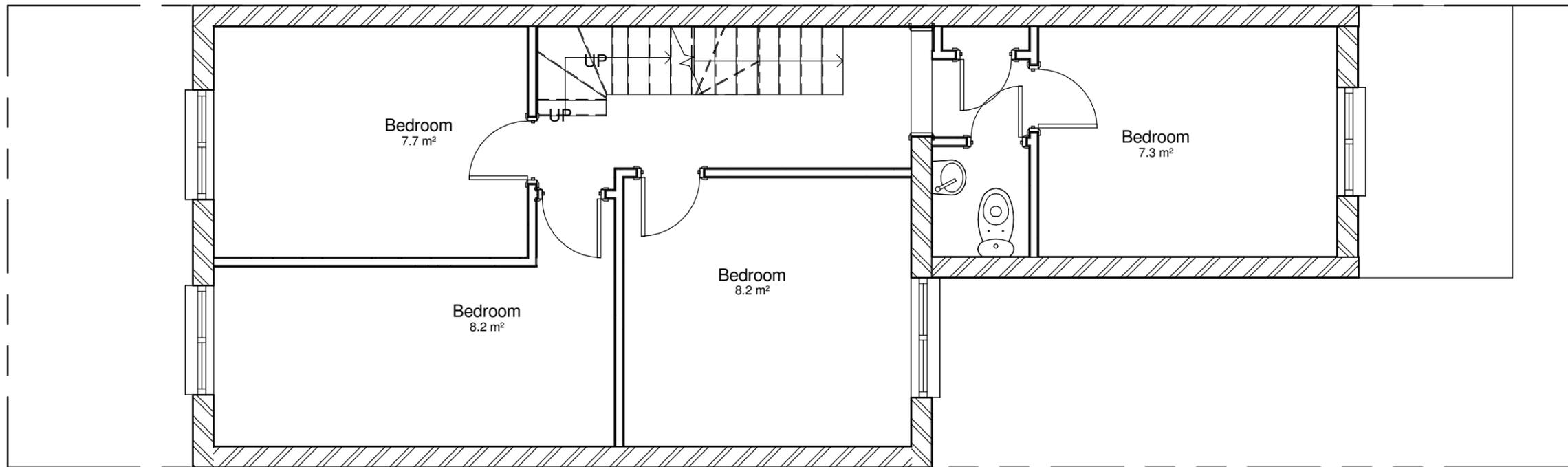
70 Gelligaer Street

Deven Patel

First Floor As Existing.

Project number	JP70	<b>A109</b>
Date	05.04.17	
Drawn by	John Pinn	
Checked by	N/A	
Scale		1 : 50

A112  
1



**1** **01 - First Floor Proposed**  
1 : 50

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No.	Description	Date

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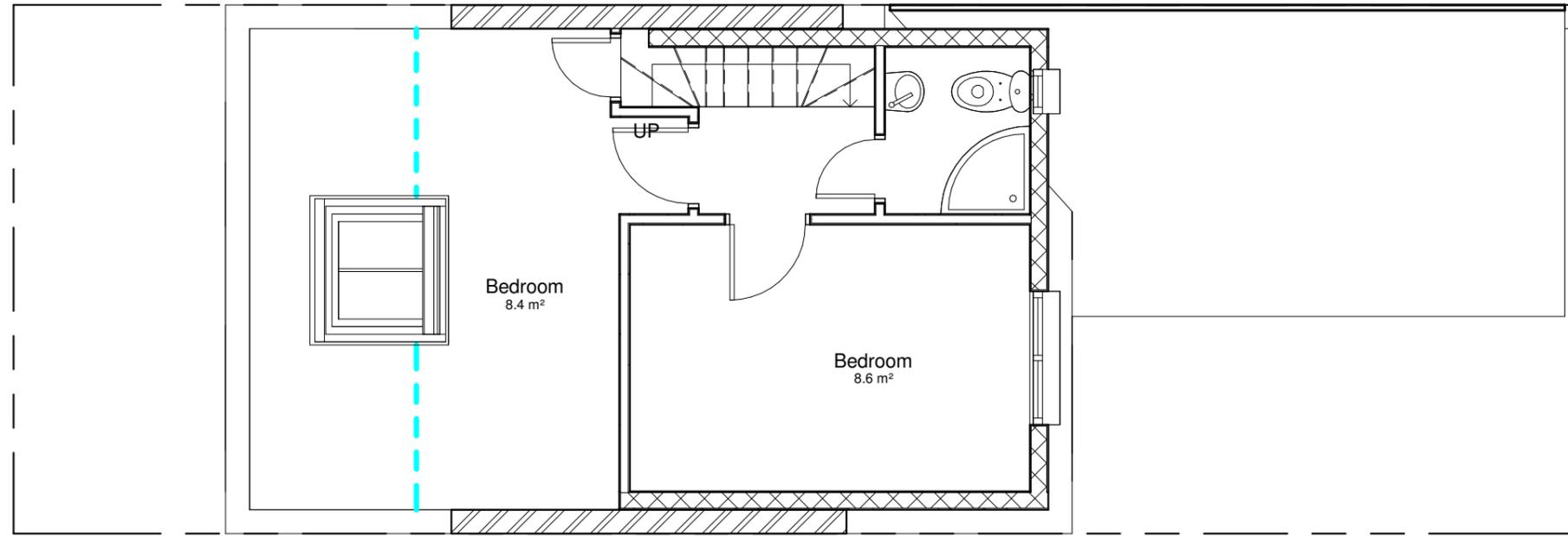
First Floor As Proposed

Project number	JP70
Date	31.05.17
Drawn by	John Pinn
Checked by	N/A

**A109**

Scale 1 : 50

A112  
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No.	Description	Date

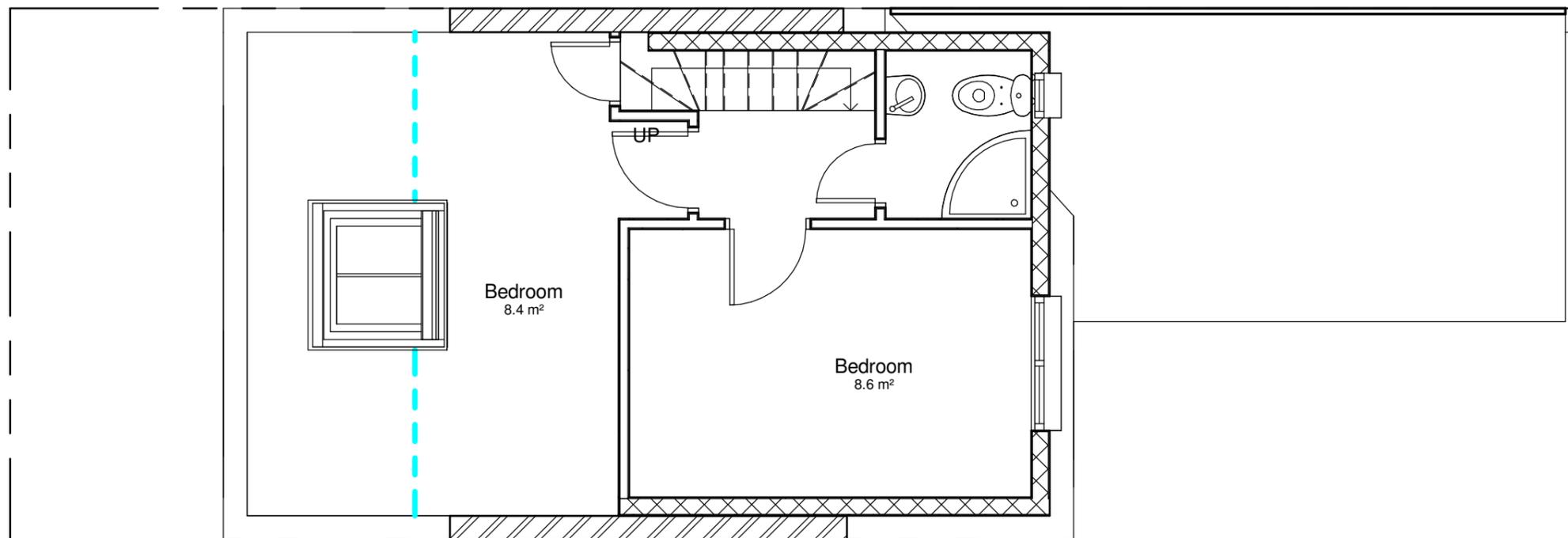
70 Gelligaer Street

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Second Floor As Existing.

Project number	JP70	<b>A110</b>
Date	05.04.17	
Drawn by	John Pinn	
Checked by	N/A	
Scale		1 : 50

A112  
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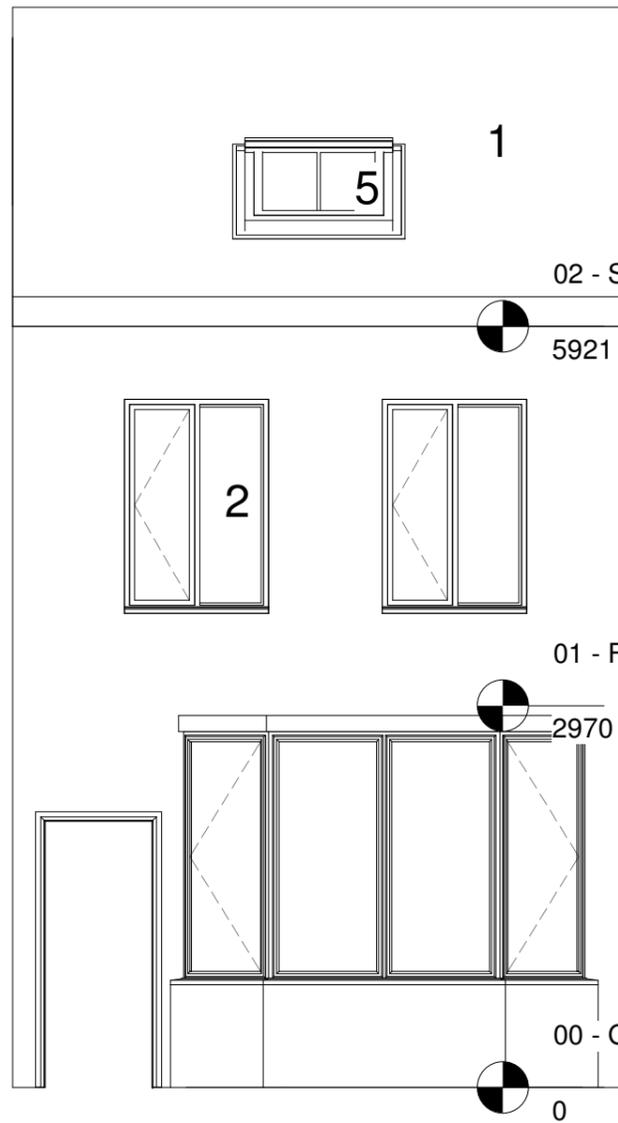
**1** **02 - Second Floor Proposed**  
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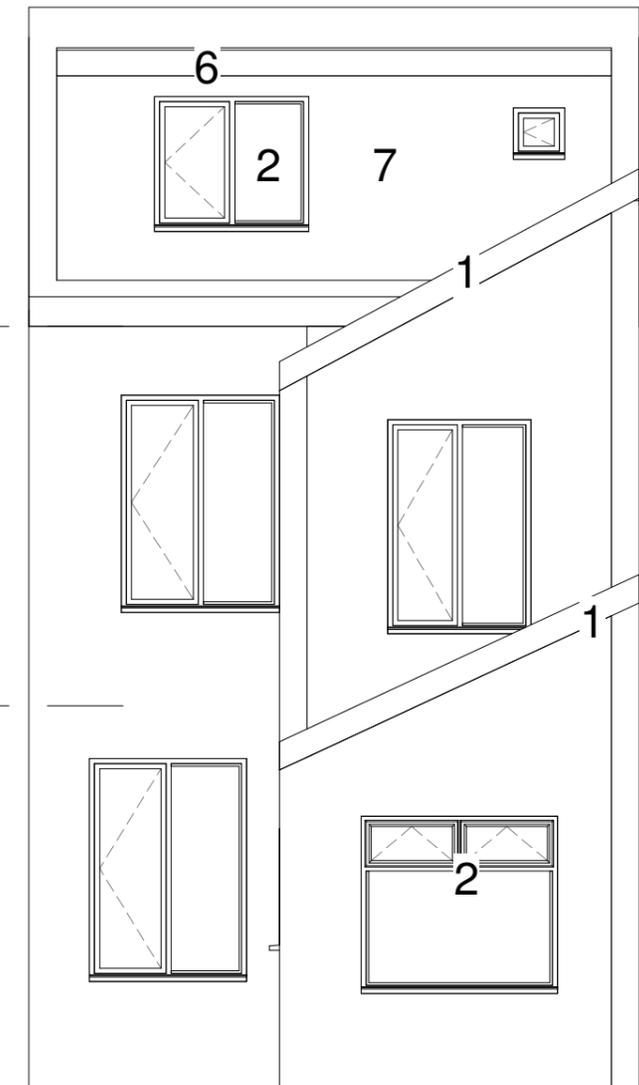
70 Gelligaer Street
Deven Patel

Second Floor As Proposed		<b>A110</b>
Project number	JP70	
Date	31.05.17	
Drawn by	John Pinn	
Checked by	N/A	Scale 1 : 50



Front Elevation

- Legend**
- 1. Slate roof
  - 2. uPvc windows
  - 3. Red brick
  - 4. Sand & cement render
  - 5. Roof Light
  - 6. Flat Roof
  - 7. Hanging Slated Floor Existing



Rear Elevation

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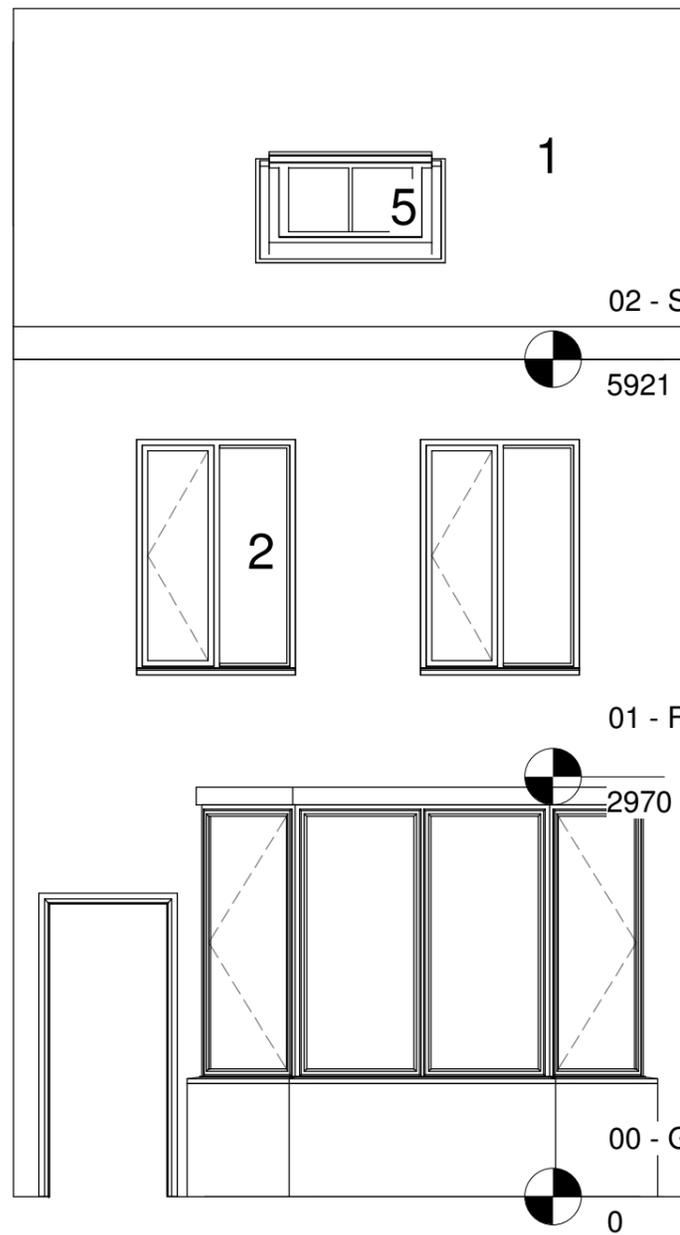
No.	Description	Date

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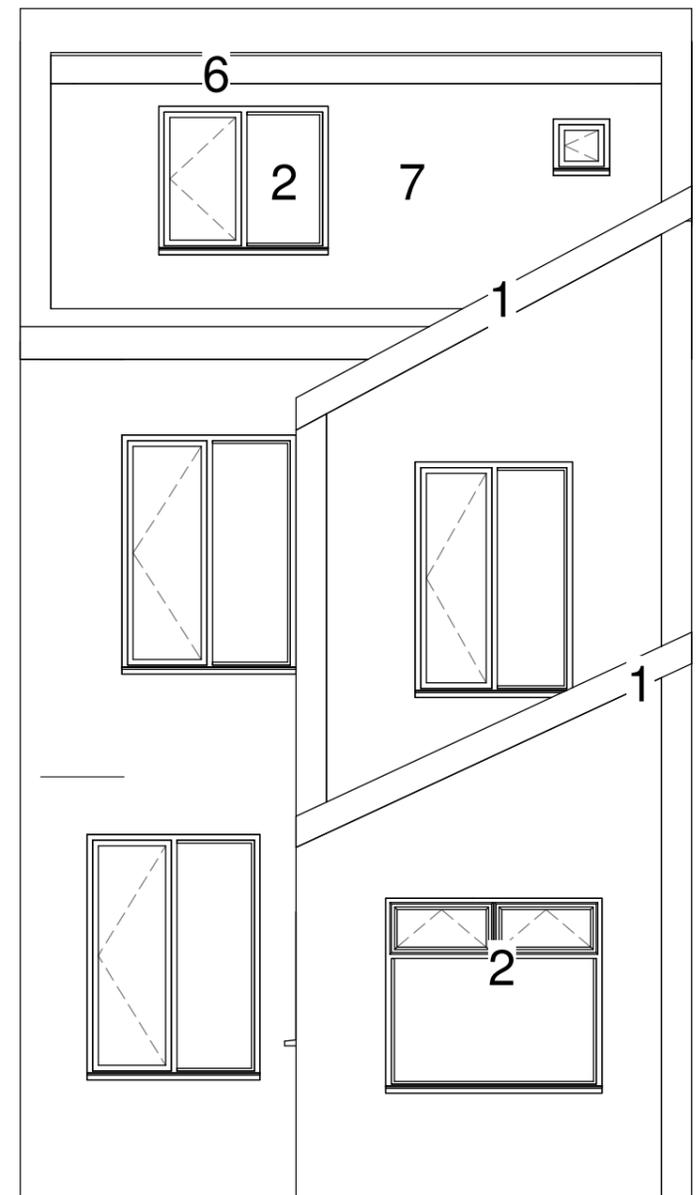
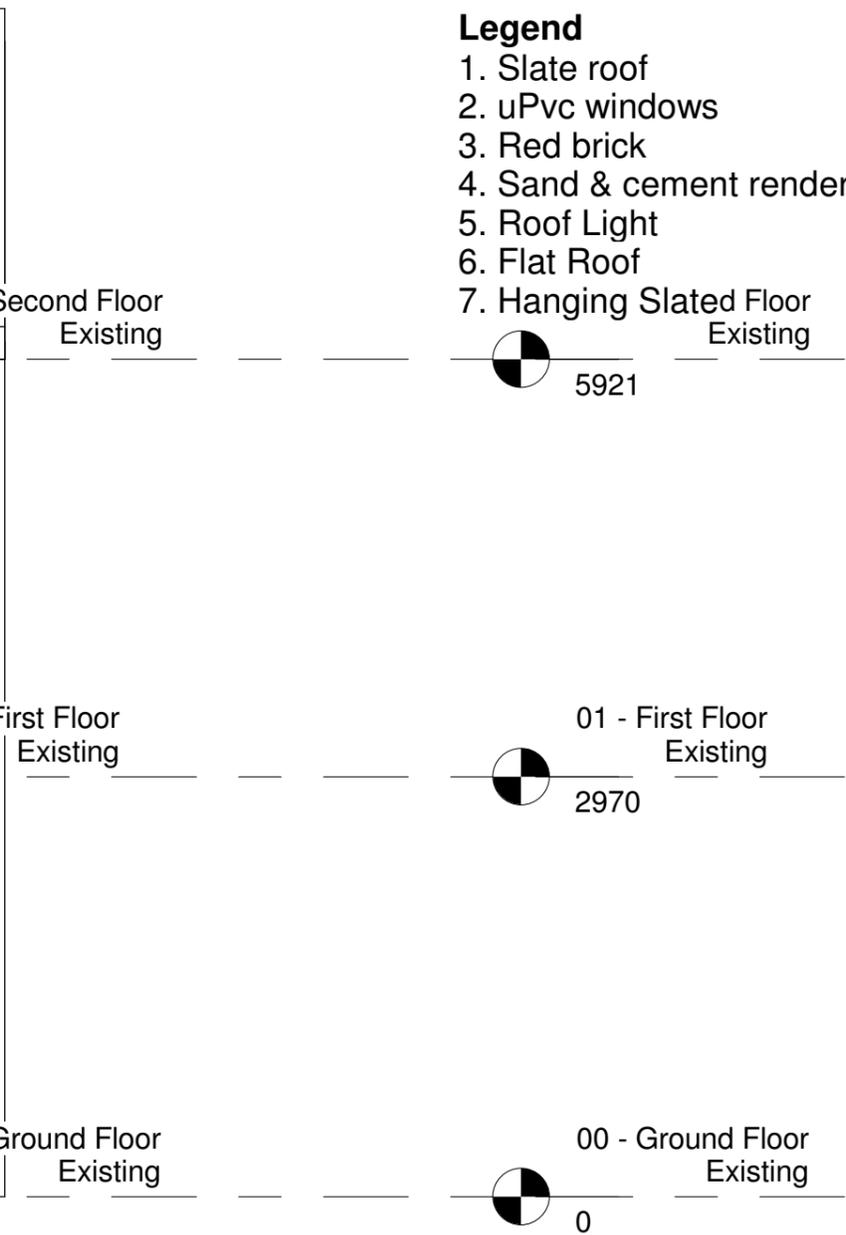
Elevations As Existing

Project number	JP70	<b>A111</b>
Date	05.04.17	
Drawn by	John Pinn	
Checked by	N/A	
Scale		1 : 50



**Legend**

- 1. Slate roof
- 2. uPvc windows
- 3. Red brick
- 4. Sand & cement render
- 5. Roof Light
- 6. Flat Roof
- 7. Hanging Slated Floor



**1 Front Elevation Proposed**  
1 : 50

**2 Rear Elevation Proposed**  
1 : 50

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No.	Description	Date

70 Gelligaer Street

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Elevations As Proposed

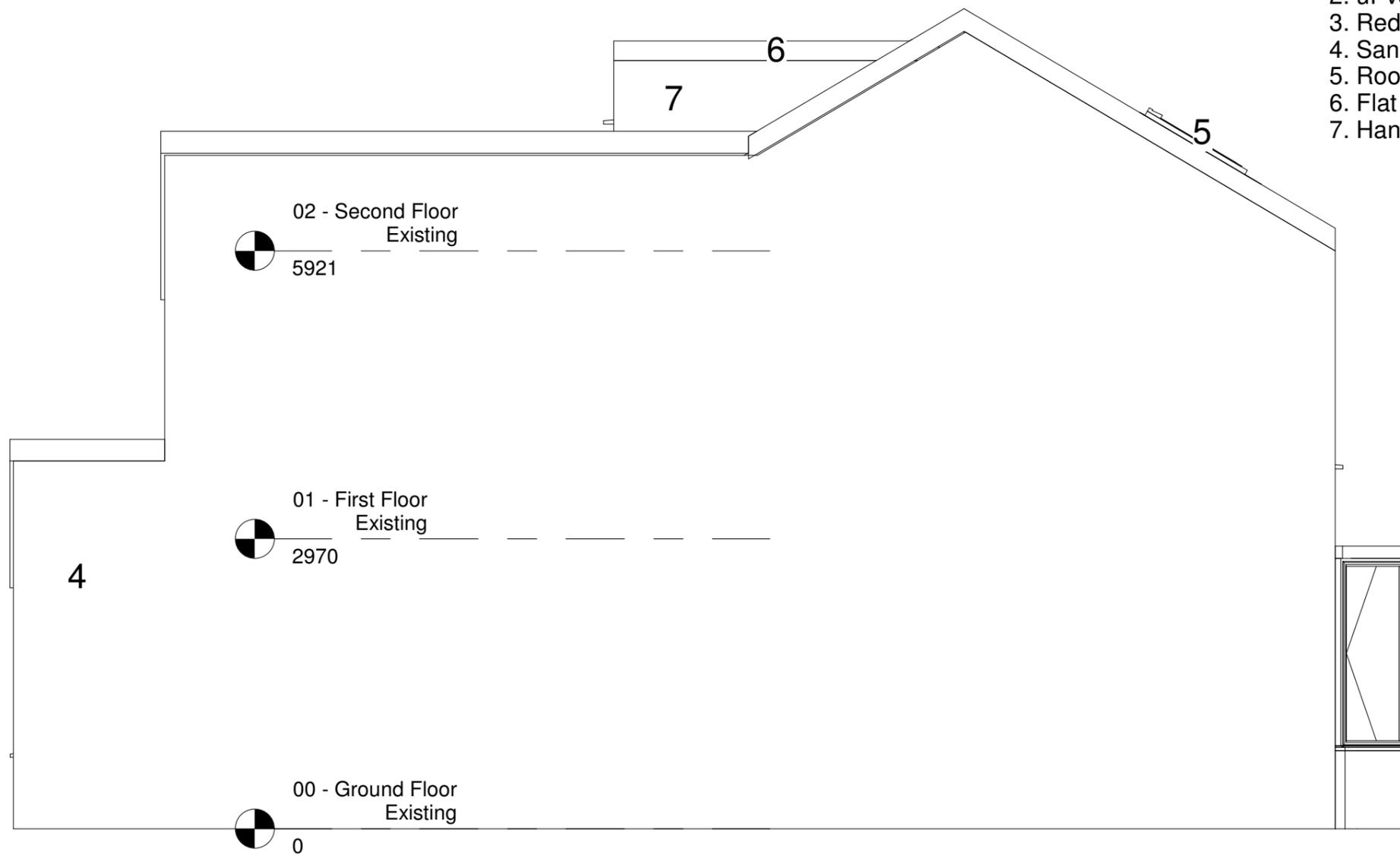
Project number	JP70
Date	31.05.17
Drawn by	John Pinn
Checked by	N/A

**A111**

Scale 1 : 50

**Legend**

- 1. Slate roof
- 2. uPvc windows
- 3. Red brick
- 4. Sand & cement render
- 5. Roof Light
- 6. Flat Roof
- 7. Hanging Slate



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No.	Description	Date

70 Gelligaer Street

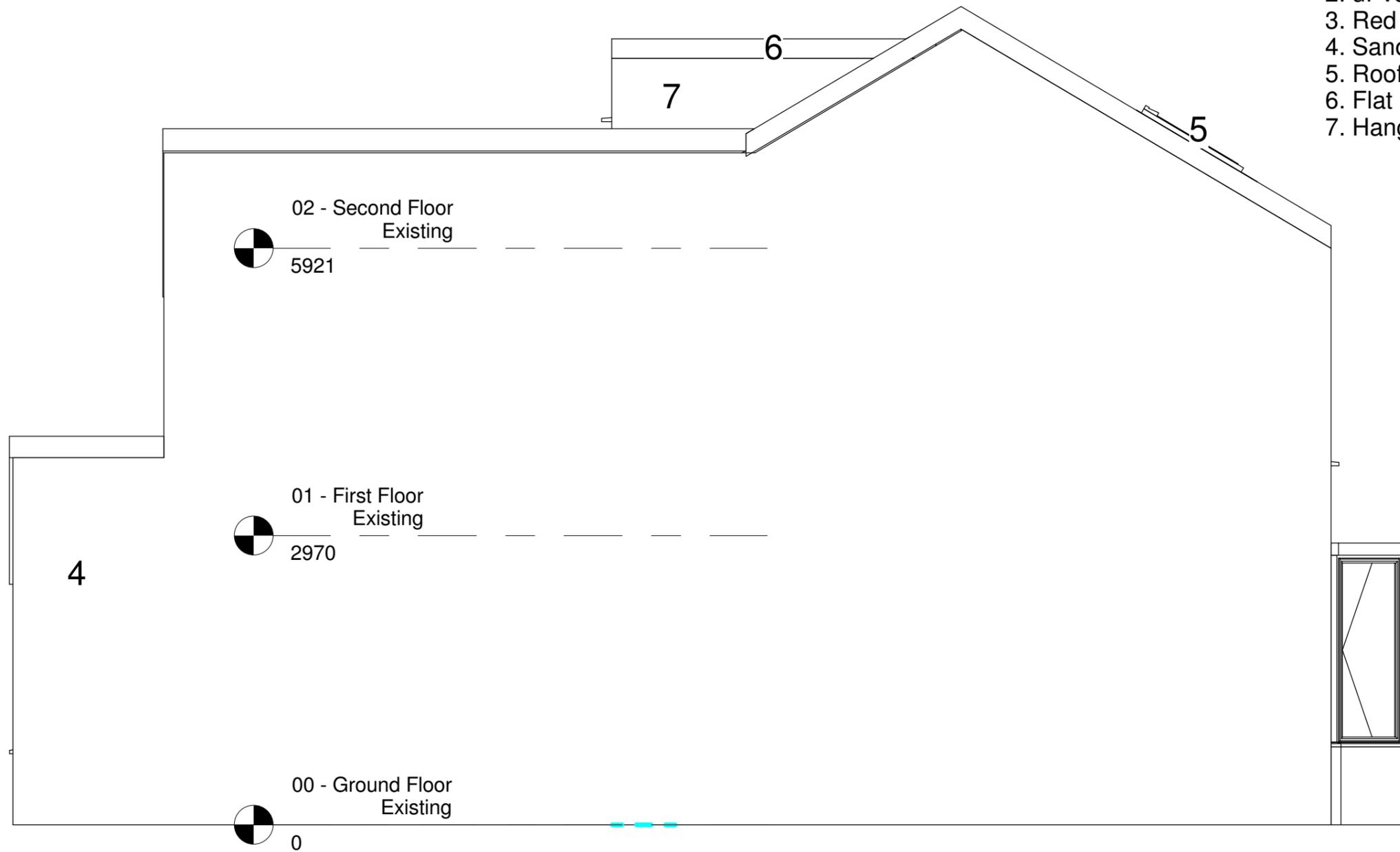
Deven Patel

Elevation As Existing

Project number	JP70	<b>A112</b>
Date	05.04.17	
Drawn by	John Pinn	
Checked by	N/A	
Scale		1 : 50

**Legend**

- 1. Slate roof
- 2. uPvc windows
- 3. Red brick
- 4. Sand & cement render
- 5. Roof Light
- 6. Flat Roof
- 7. Hanging Slate



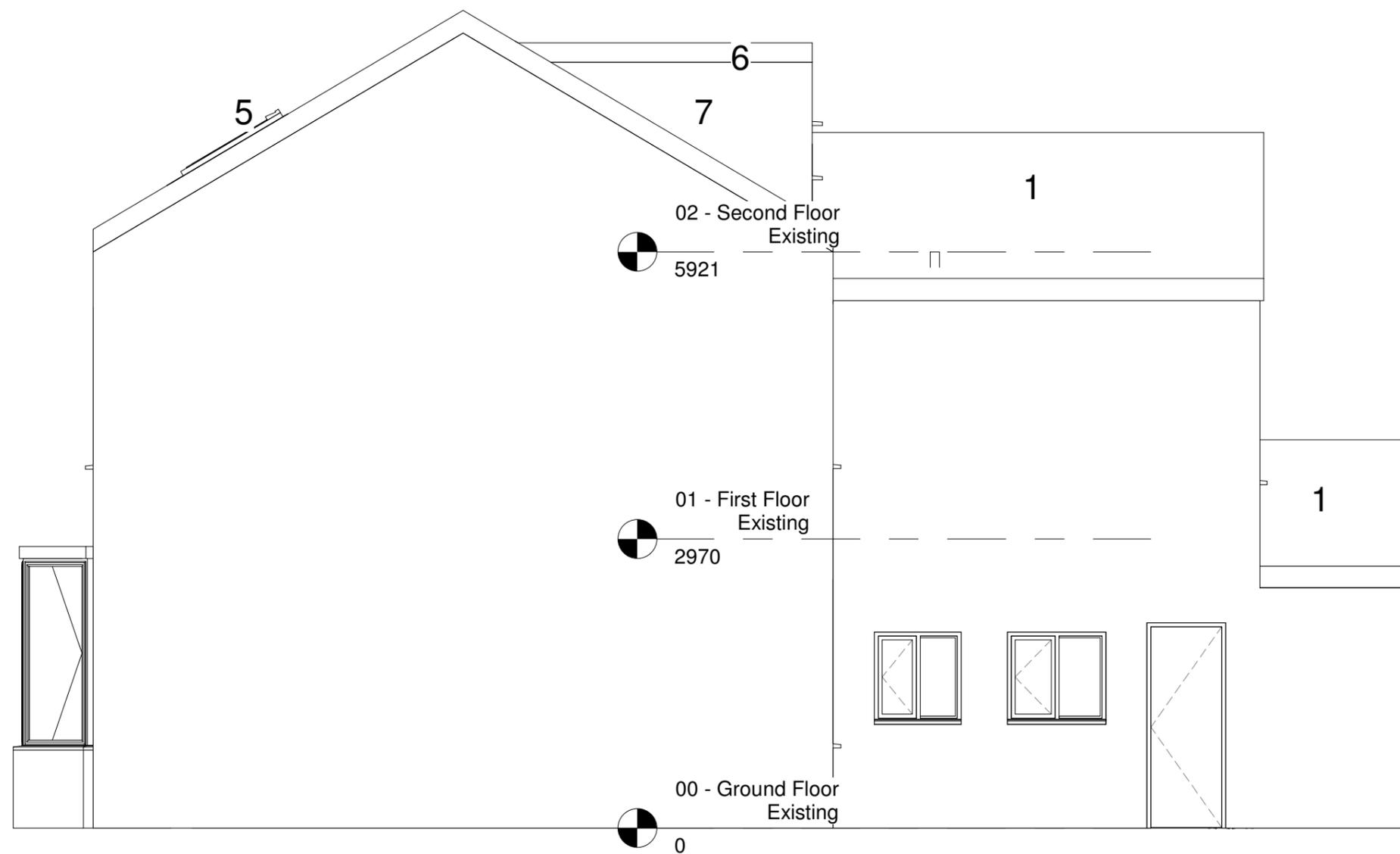
**1 Left Elevation Proposed**  
1 : 50

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No.	Description	Date

70 Gelligaer Street
Deven Patel

Elevation As Proposed		<b>A112</b>
Project number	JP70	
Date	31.05.17	
Drawn by	John Pinn	
Checked by	N/A	Scale 1 : 50



- Legend**
- 1. Slate roof
  - 2. uPvc windows
  - 3. Red brick
  - 4. Sand & cement render
  - 5. Roof Light
  - 6. Flat Roof
  - 7. Hanging Slate

70 Gelligaer Street

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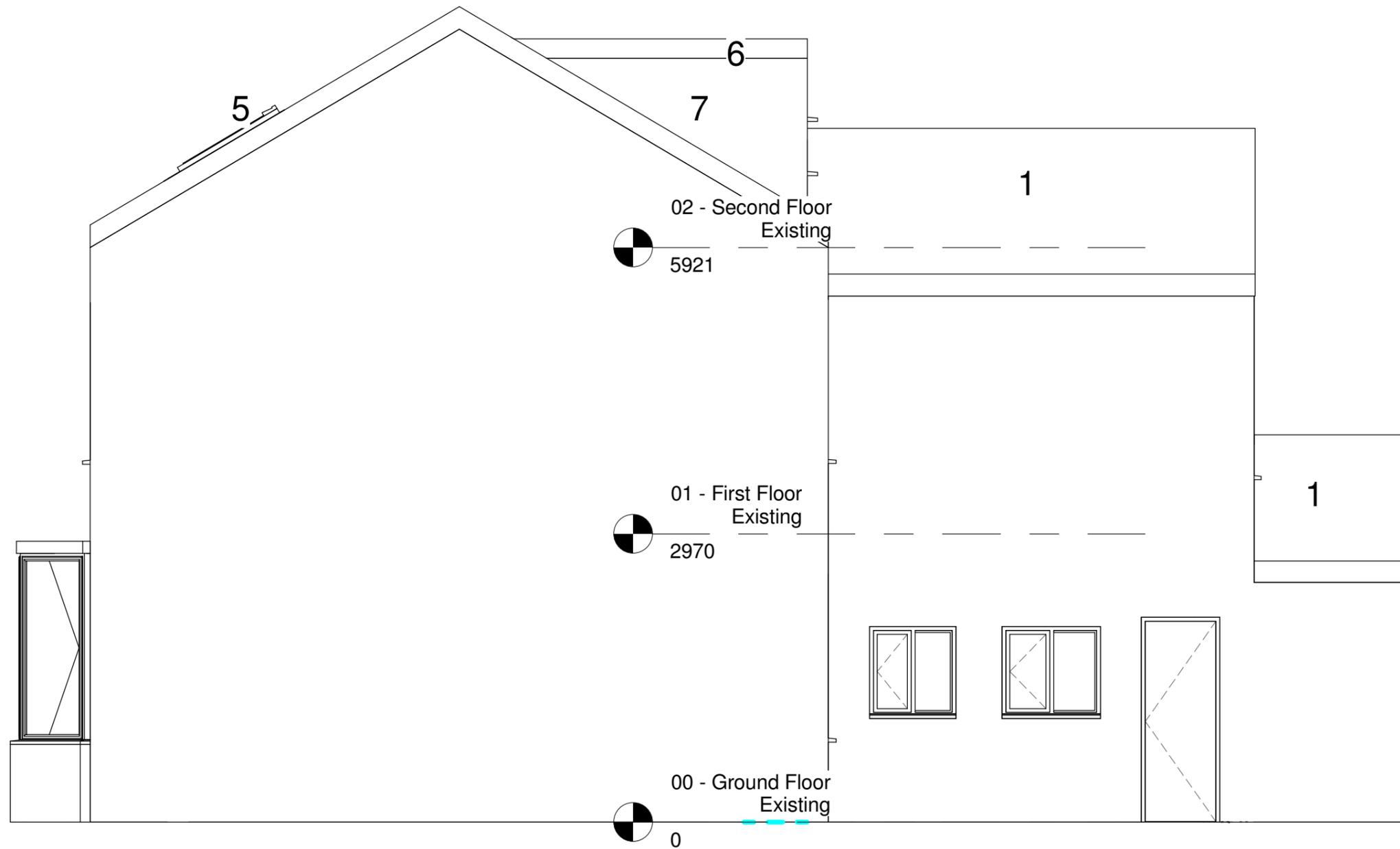
No.	Description	Date

70 Gelligaer Street

Deven Patel

Elevation As Existing

Project number	JP70	<b>A113</b>
Date	05.04.17	
Drawn by	John Pinn	
Checked by	N/A	
Scale		1 : 50



- Legend**
- 1. Slate roof
  - 2. uPvc windows
  - 3. Red brick
  - 4. Sand & cement render
  - 5. Roof Light
  - 6. Flat Roof
  - 7. Hanging Slate

**1 Right Elevation Proposed**  
1 : 50

70 Gelligaer Street  
  
www.cps homes.co.uk

No.	Description	Date

70 Gelligaer Street  
  
Deven Patel

Elevation As Proposed		A113
Project number	JP70	
Date	31.05.17	
Drawn by	John Pinn	
Checked by	N/A	Scale 1 : 50