

**Location** **23 Ravenshurst Avenue London NW4 4EE**

**Reference:** **21/0746/FUL** Received: 11th February 2021  
Accepted: 12th February 2021

Ward: Hendon Expiry: 9th April 2021

**Case Officer:** **Mansoor Cohen**

Applicant: Jewish Marriage Counsel

Proposal: Roof extension involving side dormer windows. Providing a House in Multiple Occupation (HMO) at ground floor for 8no. people. Office and counselling rooms at first floor. Associated cycle store and refuse/recycling area

### **OFFICER'S RECOMMENDATION**

Refuse

AND the Committee grants delegated authority to the Service Director – Planning and Building Control to make any minor alterations, additions or deletions to the recommended conditions/obligations or reasons for refusal as set out in this report and addendum provided this authority shall be exercised after consultation with the Chair (or in their absence the Vice-Chair) of the Committee (who may request that such alterations, additions or deletions be first approved by the Committee)

- 1 The proposed development would result in the reduction of employment floorspace in an edge of town centre location. The applicant has failed to provide evidence in relation to a marketing campaign to demonstrate that there has been no interest expressed in the unit for its existing or alternative business use in the short, medium and long term. In the absence of this information, the proposed development would result in the loss of employment generating floorspace which could adversely impact the vitality and viability of the Brent Street Town Centre contrary to Policy DM14 of the Local Plan Development Management Policies DPD (2012); Policies CS1 and CS NPPF of the Local Plan Core Strategy (2012) and Policy E6 of the London Plan (2021).
- 2 The proposed change of use to an HMO has failed to evidence an identified need for this type of accommodation and would introduce a use that is incongruous to the established character of the area which is characterised predominantly by single family dwelling houses to the detriment of the character and amenity of the locality. The proposed development would therefore be contrary to Policies CS NPPF, CS1 and CS5 of the Barnet's Adopted Core Strategy (2012), Policy DM01 and DM09 of the Adopted Development Management Policies DPD (2012) and the Adopted Residential Design Guidance SPD (2016).

- 3 The proposed 6no. dormers by reason of their excessive number, size, massing, siting and design, would fail to appear as a subordinate, proportionate or sympathetic addition to the existing building, to the detriment of the character and appearance of the host property and surrounding area, contrary to Policy D3 of the London Plan (2021), Policies CS1 and CS5 of the LB Barnet: Local Plan Core Strategy DPD (2012), Policy DM01 of the LB Barnet: Local Plan Development Management Policies DPD (2012) and the Residential Design Guidance SPD (2016)
- 4 The proposed change of use to an 8no person HMO, in combination with the proposed office/counselling use, would harmfully increase noise, disturbance and disruption to neighbouring residents through associated increased coming and goings and general activity amounting to an over-intensive use of the site detrimental to the residential amenities of neighbouring occupiers. The proposal would therefore be contrary to Policies CS1 and CS5 of the Local Plan Core Strategy (adopted September 2012), Policies DM01, DM02 and DM09 of the Development Management Policies DPD (adopted September 2012), the Residential Design Guidance SPD (adopted 2016) and the Sustainable Design and Construction SPD (adopted 2016).
- 5 The proposed HMO would provide a substandard level of living accommodation for future occupiers, by way of poor outlook and light, in particular for Units 01, 04 and 06 and a lack of any outdoor amenity space for all units, contrary to Policies D3 and D6 of the London Plan (2021), Policies DM01 and DM02 of the Local Plan Development Management Policies 2012; the Barnet Residential Design Guidance SPD (Adopted October 2016) and the Barnet Sustainable Design and Construction Supplementary Planning Document (Adopted October 2016).
- 6 The proposal would provide insufficient off-street parking provision and in the absence of a legal agreement to amend the traffic order or a current parking survey to demonstrate that there is sufficient on street parking capacity for the potential parking overspill, the development when combined with an inflated occupancy level and low PTAL score would result in a heightened level of parking pressure and congestion, to the detriment of highway and pedestrian safety and the free-flow of traffic, contrary to Policies T4, T6 and T6.1 of the London Plan (2021), Policy CS9 of the Local Plan Core Strategy (2012), and Policy DM17 of the Local Plan Development Management Policies DPD (2012)

**Informative(s):**

- 1 The plans accompanying this application are:

U-J11495-A-1.1 Rev 1  
U-J11495-A-2.1 Rev 1  
U-J11495-A-2.2 Rev 1  
U-J11495-A-3.1 Rev 1

U-J11495-A-4.1 Rev 1  
U-J11495-A-4.2 Rev 1  
U-J11495-A-5.1 Rev 1  
U-J11495-A-6.1 Rev 1  
U-J11495-A-6.2 Rev 1  
U-J11495-A-7.1 Rev 1  
U-J11495-A-8.1 Rev 1  
U-J11495-A-8.2 Rev 1  
U-J11495-A-9.1 Rev 1  
Planning Statement by UPP

- 2 In accordance with paragraphs 38-57 of the NPPF, the Council takes a positive and proactive approach to development proposals, focused on solutions. To assist applicants in submitting development proposals, the Local Planning Authority has produced planning policies and written guidance to guide applicants when submitting applications. These are all available on the Council's website. A pre-application advice service is also offered.

The applicant sought formal pre-application advice which was provided. Unfortunately the submitted scheme is not considered to accord with the Development Plan. If the applicant wishes to submit a further application, the Council is willing to assist in identifying possible solutions through the pre-application advice service.

- 3 This is a reminder that should an application for appeal be allowed, then the proposed development would be deemed as 'chargeable development', defined as development of one or more additional units, and / or an increase to existing floor space of more than 100 sq m. Therefore the following information may be of interest and use to the developer and in relation to any future appeal process:

We believe that your development is liable for CIL. The Mayor of London adopted a CIL charge on 1st April 2012 setting a rate of £60 per sq m on all forms of development in Barnet except for education and health developments which are exempt from this charge. The London Borough of Barnet first adopted a CIL charge on 1st May 2013. A new Barnet CIL Charging Schedule applies from 1 April 2022 (<https://www.barnet.gov.uk/planning-and-building/planning/community-infrastructure-levy>) which applies a charge to all residential (including sui generis residential), hotel, retail and employment uses.

Please note that Indexation will be added in line with Regulation 40 of Community Infrastructure Levy.

Liability for CIL is recorded to the register of Local Land Charges as a legal charge upon a site, payable should development commence. The Mayoral CIL charge is collected by the London Borough of Barnet on behalf of the Mayor of London; receipts are passed across to Transport for London to support Crossrail.

The assumed liable party will be sent a 'Liability Notice' providing full details of the charge and to whom it has been apportioned for payment. If you wish to identify named parties other than the original applicant for permission as the liable party for paying this levy, please submit to the Council an 'Assumption of Liability' notice;

also available from the Planning Portal website.

The Community Infrastructure Levy becomes payable upon commencement of development. A 'Notice of Commencement' is required to be submitted to the Council's CIL Team prior to commencing on site; failure to provide such information at the due date will incur both surcharges and penalty interest. There are various other charges and surcharges that may apply if you fail to meet other statutory requirements relating to CIL, such requirements will all be set out in the Liability Notice you will receive. You may wish to seek professional planning advice to ensure that you comply fully with the requirements of CIL Regulations.

If you have a specific question or matter you need to discuss with the CIL team, or you fail to receive a 'Liability Notice' from the Council within 1 month of any appeal being allowed, please contact us: [cil@barnet.gov.uk](mailto:cil@barnet.gov.uk).

#### Relief or Exemption from CIL

If social housing or charitable relief applies to your development or your development falls within one of the following categories then this may reduce the final amount you are required to pay; such relief must be applied for prior to commencement of development using the 'Claiming Exemption or Relief' form available from the Planning Portal website: [www.planningportal.gov.uk/cil](http://www.planningportal.gov.uk/cil).

You can apply for relief or exemption under the following categories:

1. Charity: If you are a charity, intend to use the development for social housing or feel that there are exception circumstances affecting your development, you may be eligible for a reduction (partial or entire) in this CIL Liability. Please see the documentation published by the Department for Communities and Local Government at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6314/19021101.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6314/19021101.pdf)

2. Residential Annexes or Extension: You can apply for exemption or relief to the collecting authority in accordance with Regulation 42(B) of Community Infrastructure Levy Regulations (2010), as amended before commencement of the chargeable development.

3. Self Build: Application can be made to the collecting authority provided you comply with the regulation as detailed in the [legislation.gov.uk](http://legislation.gov.uk).

Please visit [www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil](http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil) for further details on exemption and relief.

### **OFFICER'S ASSESSMENT**

The application has been called in at the request of Cllr J Conway on the following grounds:

*"The site is close to Middlesex University with many students preferring to live in semi-private accommodation, away from student dormitories as well as those who cannot afford private flat shares. Therefore, HMO accommodation is the ideal solution. Given its location, the site is ideally located for such purposes.*

Similarly, Policy DM09 states that new HMOs will be encouraged where they meet an identified need, can demonstrate that they will not harm character and amenities and are easily accessible by public transport, walking and cycling. The site is located in extremely close proximity to the Brent Street Town Centre. Whilst the site has a PTAL of 2, there are 5 different bus routes within 200 metres of the site, providing excellent public transport links. Given its proximity to the town centre, it is easily accessible by walking and public transport.

HMO accommodation is more temporary by nature and residents are less likely to be concerned about their immediate surroundings than those in flats, which tend to provide more permanent family accommodation. As such, HMO accommodation is viewed as more compatible with the propose office/counselling services above than the provision of flats as residents will be based in their rooms/communal areas to the rear and will not be focused on visitors to the charity. As HMOs tend to be occupied by students, it is more likely that they will be in lectures during the day, thereby maintaining privacy for the charity and its client"

## **1. Site Description**

The application site consists of a single storey building with dual pitched roof. The building perimeter is treated with 2m high palisade metal fencing all the way around.

Ravenhurst Avenue meets Somerset Road and the building is accessed through a link to West View which abuts the head of Egerton Gardens in close proximity to the site.

Ravenhurst Avenue is predominantly made up of large rows of terrace town houses that present double vertical bays to the street scene, it has a strong architectural rhythm. There is more of a mix on Somerset Road where Georgian bay dwellings and a late 20th century infill of terrace houses sit opposite one another.

The site does not include a listed building and is not in a conservation area.

## **2. Site History**

Reference: W04765  
Address: Shree Swaminarayan Temple Somerset Road NW4  
Proposal: Erection of a second floor  
Decision: Refused 18 Dec 1974

Reference: W04765A  
Address: Former Shree Swaminarayan Temple Somerset Road NW4  
Proposal: Change of use from a place of worship to a marriage counselling centre  
Decision: Approved subject to conditions 19 Oct 1983

Reference: W04765B  
Address: 23 Ravenshurst Avenue London NW4  
Proposal: Retention of covered way.  
Decision: Approved 07 Dec 1984

Reference: W04765C  
Address: 23 Ravenshurst Avenue London NW4  
Proposal: Side roof extensions, alterations to elevations, new entrance and covered way to side elevation.  
Decision: Approved subject to conditions 16 Jun 1997

### **3. Proposal**

The applicant seeks planning permission for a change of use of the existing ground floor offices to be used as an 8 person 8 bedroom HMO and the provision of office and counselling rooms at loft level providing a GIA of 135sqm. to facilitate the use of the loft level the proposal incorporates the installation of 6no. dormers to the dual pitched roof.

The building currently functions as an office with a floorspace of 200m<sup>2</sup>. There is an existing small lean-to element extending from the south elevation which would be utilised for the provision of cycle spaces and bin storage.

### **4. Public Consultation**

Consultation letters were sent to 59 neighbouring properties. 1no letter of objection was received stating the following:

'We object to the side dormer windows in the proposed roof extension that would overlook our garden. It would destroy the privacy of our garden'.

### **5. Planning Considerations**

#### **5.1 Policy Context**

##### National Planning Policy Framework and National Planning Practice Guidance

The determination of planning applications is made mindful of Central Government advice and the Local Plan for the area. It is recognised that Local Planning Authorities must determine applications in accordance with the statutory Development Plan, unless material considerations indicate otherwise, and that the planning system does not exist to protect the private interests of one person against another.

The National Planning Policy Framework (NPPF) was updated on 20 July 2021. This is a key part of the Governments reforms to make the planning system less complex and more accessible, and to promote sustainable growth. This is a key part of the Governments reforms to make the planning system less complex and more accessible, and to promote sustainable growth.

The NPPF states that 'good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to

communities.... being clear about design expectations, and how these will be tested, is essential for achieving this". The NPPF retains a presumption in favour of sustainable development. This applies unless any adverse impacts of a development would 'significantly and demonstrably' outweigh the benefits.

### The Mayor's London Plan 2021

The new London Plan which sets out the Mayor's overarching strategic planning framework for the next 20 to 25 years was adopted on the 2nd March 2021 and supersedes the previous Plan.

### Barnet's Local Plan (2012)

Barnet's Local Plan is made up of a suite of documents including the Core Strategy and Development Management Policies Development Plan Documents. Both were adopted in September 2012.

- Relevant Core Strategy Policies: CS NPPF, CS1, CS4, CS5.
- Relevant Development Management Policies: DM01, DM02, DM04, DM08, DM09, DM17.

The Council's approach to development as set out in Policy DM01 is to minimise the impact on the local environment and to ensure that occupiers of new developments as well as neighbouring occupiers enjoy a high standard of amenity. Policy DM01 states that all development should represent high quality design and should be designed to allow for adequate daylight, sunlight, privacy and outlook for adjoining occupiers. Policy DM02 states that where appropriate, development will be expected to demonstrate compliance to minimum amenity standards and make a positive contribution to the Borough. The development standards set out in Policy DM02 are regarded as key for Barnet to deliver the highest standards of urban design.

### Barnet's Draft Local Plan (Reg 22) 2021

Barnet's Draft Local Plan on 26th November 2021 was submitted to the Planning Inspectorate for independent examination which will be carried out on behalf of the Secretary of State for the Department of Levelling Up, Housing and Communities. This is in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2021 (as amended).

The Regulation 22 Local Plan sets out the Council's draft planning policy framework together with draft development proposals for 65 sites. The Local Plan 2012 remains the statutory development plan for Barnet until such stage as the replacement plan is adopted and as such applications should continue to be determined in accordance with the 2012 Local Plan, while noting that account needs to be taken of the policies and site proposals in the draft Local Plan and the stage that it has reached.

### Supplementary Planning Documents

Residential Design guidance SPD (adopted October 2016)

-A small House in Multiple Occupation (HMO) is a dwelling in which three to six unrelated people (separate householders; unrelated to each other) share communal facilities such as bathrooms, kitchens and living rooms. From 29 May 2016 an article 4 Direction was introduced to remove the permitted development rights to convert a dwelling house (Use Class C4) into a small HMO (Use Class C4). Larger HMO are properties occupied by more

than 6 unrelated individuals who share basic amenities such as a kitchen or bathroom facilities. They are classified as 'sui generis' (a use like no other) and always require planning permission. Policy DM09 of the Local Plan explains Barnet's policy on Houses in Multiple Occupation. HMO's may require licensing under the Housing Act and Environmental Health Act.

Sustainable Design and Construction SPD (adopted October 2016)

- Provides detailed guidance that supplements policies in the adopted Local Plan and sets out how sustainable development will be delivered in Barnet.

## **5.2 Main issues for consideration**

The main issues for consideration in this case are:

- The principle for the loss of office space
- Whether the principle of conversion to an HMO is acceptable
- The effect of the proposed development on the character and appearance of the surrounding area;
- The effect on the living conditions of neighbouring properties
- The effect on the living conditions of future occupants of the proposed HMO in terms of standard of accommodation
- Highways and Parking.

## **5.3 Assessment of proposals**

### Loss of Office Space

Policy DM14 of the Development Management Policies Document is concerned with 'New and Existing Employment Space' Part iii of this policy states:

"Office space (Class B1) should be retained in town centres and edge of centre locations. Loss of office space (Class B1) will only be permitted in town centres and edge of centre locations where it can be demonstrated to the council's satisfaction that a site is no longer suitable and viable for its existing or alternative business use in the short, medium and long term and a suitable period of active marketing has been undertaken. Where this can be demonstrated the proposal will be expected to provide appropriate mixed use re-development which provides some re-provision of employment use, residential and community use".

Part iv of Policy DM14 states:

"Proposals to redevelop or reuse an existing employment space which reduces the levels of employment use and impacts negatively on the local economy will be resisted".

The proposal is located at the edge of the Brent Street Town Centre and despite the policy referring to Class B1 (which is now E) the sentiment of the policy is still relevant in that any loss of such a use in this location needs to be justified. The applicant has not provided any supporting justification to show that an office use is no longer viable for the building. Despite some office/counselling rooms being proposed upstairs there is a reduction in floor space (from 200sqm to 135sqm). The applicant has failed to demonstrate that the ground floor of this building is no longer suitable for office use (or another use within class E) as no information of marketing the space or time spent vacant has been received. The proposal is therefore contrary to policy DM14 on this basis.



## Principle of HMO

Policy DM09 of the Development Management Policies Document is concerned with Specialist housing - Houses in Multiple Occupation, student accommodation and housing choice for older people. It states:

"Proposals for new HMO will be encouraged provided that they meet an identified need, can demonstrate that they will not have a harmful impact on the character and amenities of the surrounding area, are easily accessible by public transport, cycling and walking and meet the relevant housing standards for HMO."

The applicant has not provided any information in relation to the need for an HMO in this location. The policy is explicit in that all proposals for new HMOs should be accompanied by such justification. Reference to being in proximity to a Town Centre and/or Middlesex University does not equate to an identified need, particularly when provision of additional student accommodation for the University has been accounted for through the 'Hendon Hub' applications. The proposal is therefore considered to be contrary to policy DM09 in principle terms and the applicant has failed to demonstrate that there is a need for such tenure in the locality.

## Impact on the character and appearance of the site and wider area

Policy CS5 of Barnet's Core Strategy DPD (2012) states that the Council will ensure that development in Barnet respects local context and distinctive local character creating places and buildings of high-quality design.

Policy DM01 states, 'development proposals should be based on an understanding of local characteristics and should respect the appearance, scale, mass, height and pattern of surrounding buildings, spaces and streets'.

Barnet's Local Plan Supplementary Planning Document: Residential Design Guidance SPD (October 2016) provides more detailed residential design guidance. In respect of dormer roof extensions, guidance states: 'Dormer roof extensions should normally be subordinate features on the roof and should not occupy more than half the width or half the depth of the roof slope'.

The primary external alterations to the building relate to the addition of 3no. dormers to each side of the dual pitched roof. Each dormer individually would exceed half that height of the existing roofslope and in cumulation the dormers would exceed more than half the width of each roofslope, thereby wholly failing to comply with guidance. The additions of the dormers would add considerable bulk and mass to the building and would virtually engulf both sides of the roof slope. This results in an overly dominant top heavy development harmful to the character and appearance of the building, streetscene and locality. It is also highlighted that unlike some dwellings would feature sizeable rear dormers, the orientation of the building in relation to the street scenes from Ravenshurst Avenue, Somerset Road and Egerton Gardens would mean the development would be readily visible and visually obtrusive.

In respect of the proposed HMO use, the site is located within a predominantly residential area. A search through the council's records indicates that there are no HMO's within close proximity of the application site. Whilst there are few flats in the area, the intensification of use is different from an HMO unit. The introduction of an HMO unit at this particular confined location is considered to create an increase in footfall and the intensification of use will have a harmful impact on the character of the wider street scene as a result of the

proposed HMO use.

The level of activity resulting from groups of unconnected people, as would be the case with HMOs, would be likely to result in differing patterns of usage and behaviour as compared with residents living as single households who could be expected to share a lifestyle. In particular, there is likely to be more frequent comings and goings of residents and visitors and greater potential for increased noise and disturbance to local residents, the use of the limited garden/outside area and parking on the surrounding road network. Furthermore, in this instance, given that the premises are not being used for residential accommodation, there would be an uplift to the existing/occupancy level from 0 to 8 rooms, and considerable increase in activity when considered with the non-residential use.

The introduction of an HMO unit at this particular confined location is considered to create an increase in footfall and intensification of use, that will have a harmful impact on the character of the area and amenities of neighbouring occupiers.

#### Impact on the living conditions of neighbouring occupiers

Policy DM01 of the Development Management Policies 2012 states that all development should represent high quality design and should be designed to allow for adequate daylight, sunlight, privacy and outlook for adjoining occupiers.

Policy DM01 is explicit in that HMOs '...will not have a harmful impact on the character and amenities of the surrounding area'.

An objection has been received stating that the side dormer windows would lead to overlooking. One dormer proposed on the eastern roof pitch would allow for views across the rear amenity of number 4 Somerset Road. However, it is considered that given the use is office/counselling rooms and that there is an ability to obscure windows which could be conditioned in the event of an approval, this relationship would be acceptable.

In respect of the increased intensification of the site by way of the office use and 8 person HMO, as detailed earlier, it is considered that in this confined location surrounding residential dwellings, the proposed use as an HMO would result in an over intensification of the site that would manifest itself in increased comings and goings of residents and associated noise and disturbance detrimental to the residential amenities of neighbouring occupiers. This would be particularly more pronounced given the lack of any dedicated outdoor amenity space for occupiers of the HMO.

The proposal is thus found to have an unacceptable impact on the residential amenities of neighbouring occupiers.

#### Impact on the Amenities of future occupiers

In terms of amenity for future occupants Barnet has adopted Standards for Houses in Multiple Occupation. For single room lettings where kitchen is separate floor area must be 10m<sup>2</sup> (8.5m<sup>2</sup>) (for 1 persons max) all rooms would satisfy this requirement.

Kitchens are to have a floor area of no less than 6m<sup>2</sup> again the kitchen would exceed this, a communal lounge space is also proposed.

The Sustainable Design and Construction SPD considers in part outdoor amenity space. It states:

'Outdoor amenity space is highly valued and suitable provision will help to protect and improve the living standards of residents as well as contribute to maintaining and enhancing the wider character of the borough. Residential units with insufficient garden or amenity space are unlikely to provide good living conditions for future occupiers. For houses, amenity space should be provided in the form of individual rear gardens. For flats, options include provision communally around buildings or on roofs or as balconies. Whatever option is chosen it must be usable.'

This application does not propose any outdoor amenity, nor is there any justification as to why this is appropriate. The proposal is a large HMO (Sui Generis) and the limited availability for outdoor space would result in an unacceptable level of amenity for future occupiers of the rooms. Further to this, it is noted that a number of rooms would have windows sited in close proximity to the neighbouring flank wall providing an unacceptable level of outlook or light intake for future occupiers which cumulatively results in a poor standard of living conditions for future occupiers of the HMO. In so the proposal is contrary to the Sustainable Design and Construction SPD and Policy DM01 of the Development Management Policies Document.

### Highway Impacts

The site is located at the corner of Ravenshurst Avenue and Somerset Road. It fronts onto a residential road, lies in an area with a PTAL rating of 2 (low), on a scale of 1a to 6b, where 1a is worst and 6b is excellent accessibility to public transport. However, there are 4 bus route (240, 326, 143, 183) which can be reached from stops with 3-5 minutes walking distance of the site.

The proposal to provide a 8 bedroom HMO on the ground floor and office/counselling rooms on the first floor will attract a maximum parking provision of 0-8 car parking spaces for the HMO and for the 93sqm of B1(office) 1 parking space is required. No parking provision is proposed and Highways consider this acceptable subject to a s106 agreement with the Council to deny occupants of the development the right to purchase CPZ permits.

Given that the application is not recommended for approval, no legal agreement has been formed and so the lack of this undertaking is a reason for refusal.

#### Cycle parking:

Based on published London Plan, 8 cycle parking spaces are required for the 8bed HMO and 1 long stay and 1 short stay space for the 93sqm of office space. The proposed ground floor plan indicates 10 cycle parking spaces in two separate compartments which is acceptable. Further details can be addressed through a condition.

#### Refuse/recycling:

An integral area for bin storage is shown on the drawings at the rear of the building, this is acceptable in principle and further details could be secured through a condition.

## **5.4 Response to Public Consultation**

Addressed in the report.

## 6. Equality and Diversity Issues

The proposal does not conflict with either Barnet Council's Equalities Policy or the commitments set in the Equality Scheme and supports the Council in meeting its statutory equality responsibilities.

## 7. Conclusion

Having taken all material considerations into account, it is considered that the proposed development would in principle be unacceptable and would adversely impact the character and residential amenities of the area. The proposed HMO would also provide a sub-standard level of living accommodation for future occupiers. The application is therefore recommended for REFUSAL

