

Owens, Rebecca

From: Clee, Melissa
Sent: 07 May 2024 11:34
To: Owens, Rebecca
Subject: RE: P/23/0154 HMO at 68 - 70 Brecon Road, Merthyr Tydfil

Good Morning Rebecca

I have reviewed the above planning application and make the following observations:

1. The proposal is to have 19 bedrooms, it is unknown whether the owner intends on letting these rooms to single persons or more than one occupant per bedroom. The property is 3 storeys therefore this property will be subject to mandatory HMO licensing under the Housing Act 2004 and the owner will be required to make an application for a HMO licence.
2. Having reviewed the requirements for HMO licensing there is a requirement for one kitchen to be provided per 5 occupants. Additional facilities can be provided in one kitchen to make the provision suitable for up to 10 occupants, however in this proposal there will be at least 19 occupants. It would not be possible to provide enough facilities and circulation space within the one proposed kitchen within this property. Therefore with the current plans the property would not be eligible for a HMO licence. If the occupancy was up to 20 persons at least one additional kitchen with enough space to accommodate facilities for 10 persons would need to be provided. For 10 occupants the total communal living space (kitchen, living room, dining room) provided must be at least 27.5m² with the kitchen element being at least 11m². If the occupancy is greater than 20 then a further kitchen would need to be provided to comply with the following:

	1-3 occupants	4 occupants	5 occupants	6 occupants	7-10 occupants	11-15 occupants
Kitchen	5m ²	6m ²	7m ²	9m ²	11m ²	
Living room	8.5m ²	11m ²	11m ²	11m ²	16.5m ²	21.5m ²
Total communal living space **	13.5m ²	17m ²	18m ²	20m ²	27.5m ²	

** occupiers forming a group (includes kitchens, dining rooms and living rooms – the kitchen must be at least the minimum size specified above)

3. There is a further requirement that a kitchen must not be situated more than one floor distance from a unit of accommodation, lounge or dining area. As this property is 3 storeys if the kitchens provided are not large enough to accommodate a dining, living room space (i.e the total communal living space specified in the table above), then an additional living room / dining room would need to be provided and comply with the minimum sizes specified in the table above. However this would need to be provided one either the ground or first floors so that it is within one floor distance of the ground floor kitchen.
4. In addition to this, where a living room or dining room is provided, as they are habitable rooms they would need to be provided with adequate natural lighting and ventilation. This would require windows that are openable to the outdoors. The kitchen and living room/dining room that are shown in the plans are only provided with sky lights, which may not be easily accessible to be opened by occupants as required. Natural ventilation must have an openable window equivalent to 1/20th of the floor area and for adequate natural lighting windows must have glazed areas of at least 1/10th of the floor area.

Taking the above into consideration the plans proposed would mean that the property would not be granted a HMO licence, therefore we would need to raise an objection to the planning application for this reason.

If you require any further information or clarification on any of the above, please do not hesitate to contact me.

I am on leave tomorrow and Thursday.

Kind Regards

Melissa