

Application Reference: PA/2025/1187

Address: 18 Shiel Street, Walkden, M28 3LD

Proposal: Conversion of dwelling (Use Class C3) to 4-bedroom House in Multiple Occupation (Use Class C4)

Objection submitted by:

Cllr Jack Youd

Councillor for Walkden North

Deputy City Mayor (Finance, Support Services & Regeneration)

Formal Objection to Planning Application PA/2025/1187 – 18 Shiel Street, Walkden

I wish to formally object to this application on the grounds that the proposal conflicts with the **Salford Local Plan: Development Management Policies and Designations (SLP:DMP)**, the **Houses in Multiple Occupation Supplementary Planning Document (June 2024, updated January 2025)**, and the **Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)** following the **2024 Article 4 Direction** for Walkden North ward.

1. Policy Context

Shiel Street lies within the **Walkden North ward**, which has been covered by the **2024 Article 4 Direction** (confirmed July 2024, effective 17 November 2024). This removes permitted development rights for small HMOs (Use Class C4), meaning any new HMO must be fully justified against local plan policy and the HMO SPD.

Under **Policy HMO1** of the SPD, planning permission should **not normally be granted** where HMOs exceed **10% of all residential properties within a 100-metre radius**.

Council data shows three licensed HMOs nearby. Local evidence indicates a number of unlicensed HMOs also operate within this radius, placing the density **above the 10% threshold**. I believe there are 8 HMOs within 100m (Appendix 1). The SPD (para. 3.3) confirms that both licensed and unlicensed HMOs must be counted if there is clear evidence of use. The proposal therefore directly conflicts with **Policy HMO1**.

2. Harm to Residential Character and Amenity (Policies H10, D2, D5)

Shiel Street is a **cul-de-sac of 13 family dwellings**, all in single-household use. Introducing a multi-occupancy property would undermine the quiet residential character and established community cohesion. The development would bring increased comings and goings, parking demand, and refuse storage in a confined street with limited turning space.

The proposal is therefore contrary to **Policy H10 (1a & 1d)** and **Policies D2 and D5**, which seek to protect the positive residential character and ensure that development respects local distinctiveness and neighbour amenity.

3. Parking, Access and Highway Safety (Policies A6 & A7, H10)

The application provides **no off-street parking or cycle storage**, despite creating a 4-bedroom HMO.

Policy **A7** requires appropriate parking and drop-off facilities to prevent congestion and obstruction. The plans (ref. SS-001) make no provision for either.

Shiel Street is narrow and ends in a cul-de-sac; refuse vehicles already experience difficulty turning. Any increase in car ownership from four adult residents will add to congestion and obstruction risk, particularly on collection days. The proposal fails to demonstrate compliance with **Policies A6, A7, and H10 (1b)**.

4. Inadequate Waste Storage (Policy WM1, HMO SPD §2.10–2.11, Licence Condition 44)

The plans confirm that rear access is to be removed, leaving **no provision for bin storage other than at the front**.

This conflicts with:

- **Policy WM1 (Waste and Development)**
- **Policy H10 (1b)** on waste management impacts
- **Licence condition 44** of Salford's HMO licensing requirements, which mandates adequate refuse storage within the curtilage.

Front-stored bins will harm visual amenity and obstruct footways, particularly given the narrow frontage of terraced properties on the street.

Failure to Discharge Previous Planning Condition

This applicant previously had a planning application at this same property approved at planning committee with the following condition:

No above ground works shall be undertaken until details of a bin store enclosure to accommodate four 240 litre wheelie bins within the front curtilage of the subject dwelling have been submitted to and approved in writing by the Local Planning Authority. The details shall include the siting of the bin store enclosure, its dimensions and materials. The bin store enclosure shall be implemented in accordance with the approved details and made available for its intended use within six months of the commencement of above ground works and shall be retained thereafter.

Reason: In the interests of amenity and ensuring adequate provision for waste storage and collection in accordance with Policies D2, D5 and WM1 of the Salford Local Plan Development Management

However, above ground works started in February 2025 and the above condition **was not discharged** despite this reasonable requirement from the planning committee being put in place.

5. Substandard Internal Space – Non-Compliance with Minimum Room Standards (Policies H2, H10; HMO Licensing Regulations 2018)

Measurements shown in the planning documents show Bedroom 3 as having **6.6 m²** in space, I believe this is incorrect based on evidence from Millbrook Estate Agents from November 2024 show the Bedroom as being 2.34m x 1.97m (Appendix 2). The new plans show the wall being removed and the room extended to 2.7m. This would mean **Bedroom 3 measures approximately 5.32 m²**, which falls below the **statutory minimum of 6.51 m²** for one adult occupant under the **Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018** and Salford's **HMO licence condition 40**.

This means the proposed layout **could not be lawfully licensed** under the Housing Act 2004. Approving a scheme incapable of meeting mandatory licensing standards would be contrary to **Policy H2 (Size of dwellings)** and **Policy H10**, which require adequate living conditions.

6. Overdevelopment and Cumulative Impact (Policies D1 & H10)

The applicant already holds planning permission for extensions to this property. The proposed HMO use, when combined with those extensions, represents an **over-intensification of a small domestic plot** with insufficient parking, waste storage and amenity space.

This cumulative effect would significantly harm the character and amenity of neighbouring dwellings, contrary to **Policies D1 and H10**.

7. Enforcement and Management Concerns

If the development proceeds without proper licensing or management oversight, it risks exacerbating issues already identified in Salford's **2023 Article 4 Direction Evidence Base**, including antisocial behaviour, poor waste management, and loss of family housing stock in Walkden North.

The application provides no management plan, tenancy information, or evidence of a fit-and-proper licence holder, contrary to expectations under the **HMO SPD (para 2.10–2.11)** and the **MHCLG 2018 national guidance** which requires planning and licensing regimes to operate coherently.

Conclusion

For the reasons set out above, the proposal is inconsistent with the following policies of the Salford Local Plan and Supplementary Planning Documents:

- **HMO SPD Policy HMO1** – Concentration threshold exceeded
- **H10** – Unacceptable impacts on character, parking, and waste
- **H2** – Substandard internal space
- **D1, D2, D5** – Poor design, amenity and local character impact
- **A6 & A7** – Inadequate parking and access
- **WM1** – Inadequate refuse storage provision

It also fails to meet minimum national standards for HMO licensing under the **Housing Act 2004** and the **2018 Mandatory Conditions Regulations**.

The proposal would erode the residential character of Shiel Street, create parking and waste management problems, and introduce a use incapable of being licensed lawfully. It should therefore be **refused planning permission**.

Appendix 1

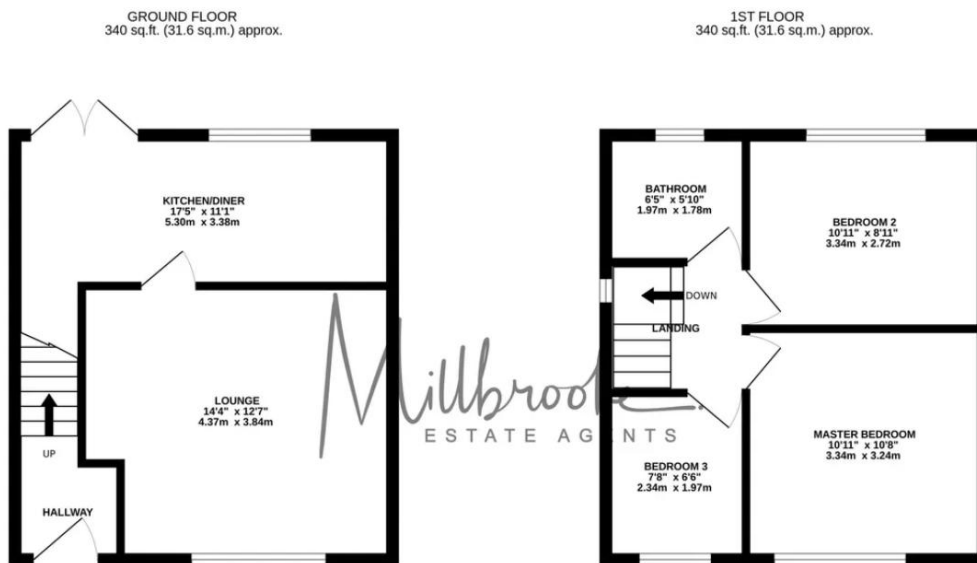
HMO list:

Cecil Road - 23, 27, 28, 32, 45

Alfred Road - 36, 41

Emlyn Street - 7

Appendix 2



TOTAL FLOOR AREA: 681 sq.ft. (63.3 sq.m.) approx.

Whilst every attempt has been made to ensure the accuracy of the floorplan contained here, measurements of doors, windows, rooms and any other items are approximate and no responsibility is taken for any error, omission or mis-statement. This plan is for guidance purposes only and should be used as such by any prospective purchaser. The services, systems and fixtures shown have not been tested and no guarantee as to their operation can be given.

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