

Draft Response to Consultation on Local Plan LP9: Houses in Multiple Occupation)

The policy states:

Draft Policy LP9 Houses in Multiple Occupation

We will support the well-being, character and amenity of our communities by managing the proportion of houses in multiple occupation. We will do this by preventing new houses in multiple occupation or conversions to large houses in multiple occupation that either in themselves or cumulatively with other houses in multiple occupation:

- create a concentration of 10% or more houses in multiple occupation within the area defined by a 100m radius around the application site;
- result in a residential dwelling being sandwiched between two houses in multiple occupation;
- damage the social and physical character and amenity of a street or residential area;
- generate noise and disturbance which is detrimental to the amenity of the street or residential area; or
- generate a demand for on-street car parking that would prejudice the safe operation of the highway, or
- cause detriment to amenity.

Consultation Question

- *Do you agree that the proposed policy on houses in multiple occupation will achieve our objective of supporting the well-being, character and amenity of our communities?*

Most of Charnwood's communities will be unaffected by the proposed policy. The affected areas are only those in the Article 4 Directive jurisdiction and even within that the effect on the character and amenity is restricted to wards in the periphery of the university campus where capacity exists. For example many areas are already saturated with HMOS (eg Kingfisher, Storer Road and Frederick Street areas). We therefore respectfully request that submissions from those unaffected are considered in that light.

Our submission applies to all affected areas under the Article 4 Direction. Our experience is also built upon the severe effects on the Ashby Road Estate. This is an area of post-war council housing with a strong tradition of familial cohesion. However, as homes have migrated to the private sector they are overwhelmingly fall into 'buy to let' landlords. This unique situation is destroying that community.

If not, what changes to the policy would you propose and why?

The following changes are proposed in the above context.

- A. By reducing the threshold from 20% to 10% may be popularly conceived as reducing the number of HMOs or even future HMOs. In reality this will INCREASE the number of HMOs in all areas likely to be affected.

The current 20% threshold never controlled the number of HMOs, the saturated areas have stayed saturated but they have flourished in other areas like Nanpantan and the Ashby Road Estate.

Furthermore, there is no robust justification in any of the evidence for 10% except that it is not as bad as 20%.

- B There is no robust or credible evidence of further demand for HMOs in either of the papers presented in support of the policy. All the evidence is to the contrary.

- The University has no plans for expansion.
The campus has more student bedrooms than ever before and have added over 600 more this year.
- The number of student places in Purpose Built Student Accommodation off campus is higher than ever before and still growing is likely to respond to any further demand under draft planning policy LP10.
- The recent growth of Non-student HMOs is predicted to go into reverse due to the reduction in migrant labour from the EU as their economies grow and our regulations are tightened.

- C. The threshold test cannot be verified independently by those affected because Borough Councils figures are withheld from the public. Transparency is a major consideration but despite all the work done (eg by Culora and Smith) no way has been found to present the evidence needed in open session.

- D. The proposed policy is unlikely to be effective in the most affected areas and cannot be monitored in a transparent way. It therefore carries a risk of being unsound.

2. We therefore strongly recommend that the proposed policy is modified to apply a zero percent in all areas under the Article 4 Direction and that flexibility is applied through conditions where there is an essential health, occupational or social justification. It may also be permitted, by exception, where a dwelling is already sandwiched and unable to sell as a result.

Should the proposed plan proceed with a threshold limit greater than zero, with the appropriate flexibility, then we would ask for an additional threshold to apply the growth of HMOs within the STREET concerned as well as within the 100m RADIUS.

The radius can be a very arbitrary measure which was demonstrated recently in Cotswold Close. In this case the radius included an excess of HMOs in the street but included an area

of small maisonettes which were invisible and inaccessible from the street in question. Needless to say the maisonettes tipped the scales

3. We believe the monitoring of any planning policy in regard to HMOs would be significantly improved and facilitated if an Additional Licensing Scheme was implemented in addition to the mandatory scheme. This should include all properties where 3 or more people live as 2 or more households sharing facilities such as a bathroom or kitchen and at least one of the tenants pays rent.