

Eastbourne Houses in Multiple Occupation (HMO) Study

Appendices

Eastbourne Borough Council

February 2024

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Position
Version 1	June 2023	Draft for Client Review	Paul Avery	Principal Housing Consultant
Version 2	February 2024	Final Report	Paul Avery	Principal Housing Consultant

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Table of Contents

Appendix 1.1: Planning Policies Relevant to HMOs in Eastbourne	1
Appendix 2.1: EBC’s Methodology for Identifying Unlicensed Properties.....	4
Appendix 3.1: Inspection Forms	6
Appendix 4.1: Mapping Approach for Surveys	11
Appendix 4.2: Survey Form.....	12
Appendix 4.2: Detailed Survey Result Tables.....	21
Appendix 6.1: Action Taken by Other Local Planning Authorities	26

Appendix 1.1: Planning Policies Relevant to HMOs in Eastbourne

Policy	Details
Adopted Core Strategy C1: Town Centre Neighbourhood Policy	<p>The vision for the Town Centre neighbourhood will be promoted through the Town Centre Local Plan and by:</p> <ul style="list-style-type: none"> • Delivering new housing through conversions, infill development, and redevelopment; and • Protecting tourist accommodation from losses and inappropriate development.
Adopted Core Strategy C3: Seaside Neighbourhood Policy	<p>The vision for Seaside will be promoted by:</p> <ul style="list-style-type: none"> • Providing new housing through redevelopments, change of use, and conversion of floorspace above shops; and • Defending existing tourist accommodation from losses and inappropriate development.
Adopted Core Strategy D3: Tourism and Culture	<p>The importance of the entertainment, cultural, and sports facilities to the economic prosperity of Eastbourne is recognised. The Council will support the preservation and enhancement of these through the following measures:</p> <ul style="list-style-type: none"> • Resist the loss of visitor accommodation through the retention of a tourist accommodation area and protection policy.
Borough Plan Saved Policy HO2: Predominantly Residential Areas	<p>Within the predominantly residential areas schemes for new homes will be achieved through the following ways:</p> <ul style="list-style-type: none"> • Redevelopment of sites and buildings clearly demonstrated to be redundant for continued commercial and/or business use; • Conversion of existing residential and non-residential properties clearly demonstrated to be redundant for continued commercial and/or business use to provide additional dwelling units.
Borough Plan Saved Policy HO9: Conversions and Change of Use	<p>Within the primarily residential areas residential conversions and the change of use of non-residential premises to residential will be permitted subject to considerations including:</p> <ul style="list-style-type: none"> • Houses with 3 bedrooms, or less, to be retained as single private dwellings

Policy

Details

<p>Borough Plan Saved Policy HO14: Houses in Multiple Occupation</p>	<p>Planning permission will be granted for the establishment and retention of Houses in Multiple Occupation (HMOs) provided they comply with residential, visual, and environmental considerations.</p> <p>HMOs will not be permitted in the tourist accommodation area defined in Policy TO1.</p>
<p>Borough Plan Saved Policy HO15: Dedicated Student Accommodation</p>	<p>Planning permission will not be granted for the change of use of dedicated student accommodation or nursing staff accommodation, including halls of residence, unless adequate replacement accommodation is provided or there is no longer a proven need within the Borough.</p>
<p>Borough Plan Saved Policy TO1: Tourist Accommodation Area</p>	<p>Within the tourist accommodation area (shown on the Proposals Map), planning permission will be refused for proposals which are incompatible with the tourist accommodation use.</p>
<p>Borough Plan Saved Policy TO2: Retention of Tourist Accommodation</p>	<p>Within the tourist accommodation areas identified, planning permission will not be granted for the redevelopment or change of use of tourist accommodation to any other use. In this Policy 'tourist accommodation' means serviced tourist accommodation (Class C1 use) and unserviced tourist accommodation.</p> <p>Only in exceptional circumstances will planning permission be granted for any other use. This means that the applicant must demonstrate that the continuing use of land as tourist accommodation is not viable.</p>
<p>Town Centre Local Plan TC6: Residential Development in the Town Centre</p>	<p>Proposals for new residential development in the Town Centre must demonstrate how the following design issues have been addressed:</p> <ul style="list-style-type: none"> • Protecting the amenity of residential occupiers by minimising potential conflicts between different land uses including noise disturbance, smell and vibration through the design and siting of servicing areas, ventilation and mechanical extraction, and external light sources. • Provision of a mix of different dwellings to include one-, two-, and three-bedroom units to suit the needs of a range of different occupiers. • Provision of outdoor amenity space in the form of a shared communal garden, useable private balcony, or roof terrace that forms an integral part of the design of the building. • Provision of adequate bin and recycling storage that is screened from publicly accessible locations including adjoining streets, parking facilities, and open space.

Future Policy Option being Considered **Details**

<p>Issues & Options – Housing & Development Option B: Increasing the proportion of houses being delivered on sites</p>	<p>Based on density of 35 dph (average density of sites with purely 3-bed houses). This would result in mainly 3-bedroom houses (39%), as well as a high proportion of 1- and 2-bedroom apartments (28 and 17% respectively) and equate to 3,801 homes to 2038 (a 7.8% increase). The options report considers that this would result in issues of inefficient use of land.</p>
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<p>Issues & Options – Housing & Development Option C: Increasing the proportion of flats being delivered on sites</p>	<p>Based on densities of between 107-156 dph in non-town centre and 197-225 dph in town centre locations, reflecting past trends. This would result in delivery of mostly 2-bedroom flats (57%) and 1-bedroom flats (36%) and equate to 6,997 homes (a 14.4% increase). The options report considers that the use of land would be very efficient, but the homogenous supply may not match needs.</p>
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<p>Issues & Options – Housing & Development Question 38: Houses in Multiple Occupation</p>	<p>In order to reduce the strain on the private rented sector and support the continued presence of the university in Eastbourne, the Local Plan will support and encourage the provision of additional purpose-built student accommodation, particularly within the town centre (pp.108).</p>
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Appendix 2.1: EBC's Methodology for Identifying Unlicensed Properties

HMO Identification using Council Tax and Electoral Register data

There is no definitive dataset that identifies properties that are HMOs. In order to identify properties that could potentially be HMOs, data from the Council tax database as at 18th January 2023, and some limited information from the electoral register as at 25th January 2023, has been used.

There are legal restrictions on using the Electoral register data and it can only be for Elections and the prevention of fraud and crime. However, it has been possible to identify properties with four or more registered electors as no personal data is identified using this method.

The data on the Council Tax database is predominantly provided by the customer, and therefore the information is only as good as what has been submitted.

Seven indicators that a property could potentially be an HMO have been identified. However, this is not conclusive. Non-HMO may have multiple indicators, whilst there may also be small HMOs that show none of these indicators as occupier may not be registered on electoral role and minimal data provided to council tax register. In addition, there may be other information provided outside of the indicators that would exclude the property from being an HMO (e.g. if it was identified as a nursing home).

Indicators

Licensed HMO

Most 'large' HMOs should have a licence and therefore would be on the register. Some small HMOs with between 5 and 6 people living as two or more separate households should also have a licence. Small HMOs with less than 5 occupants living as separate households will not have a licence.

Some large HMOs won't be on the HMO licence register because they are exempt under Schedule 14 of the Housing Act 2004. These include buildings managed by a local housing authority, registered social landlord, police or fire & rescue authority or a health service body, and student accommodation managed directly by an educational establishment.

Identified on Electoral Register as HMO

- Only properties where there are 4 or more registered electors.
- Some information must have been available to identify this as an HMO but not unclear what.
- Does not appear to be consistently applied as there are a large number of licensed HMOs that are not identified on the electoral register as HMO.

Identified on Council Tax database as HMO

- Some information must have been available to identify this as an HMO but unclear what.
- Does not appear to be consistently applied as there are a large number of licenced HMOs that are not identified on the council tax database as HMO.

4 or more registered electors

- Potentially identifies properties with multiple adult occupiers.
- However, could include families with multi-generations living in same home as single household.
- Not all occupiers may be registered electors so could underestimate number of occupiers.
- Former occupiers may not have de-registered themselves at address so could be overestimating number of occupiers.

Council Tax account holder has different address to property

- Indicates that the person who pays the Council Tax does not live at the property.
- Transient occupiers less likely to be responsible for paying Council Tax.
- Does not necessarily confirm that there are multiple people living as separate households in property.

More than 2 occupiers with different surnames on Council Tax database

- Could indicate that there are multiple people living as separate households in property, but not conclusive.
- Occupiers could have different surnames but live as a single household.
- Not all occupiers may be identified so could underestimate number of occupiers.
- Former occupiers may not have de-registered themselves at address so could be overestimating number of occupiers.

Council Tax account holder is account holder on more than 1 property

- Council Tax Account holder has a Council Tax accounts on a number of properties could indicate that they are an HMO landlord.
- Could potentially be other reasons why someone would have multiple Council Tax accounts.

Appendix 3.1: Inspection Forms

Section 1: Property Details

Property address:
Does the property appear to be a HMO? (e.g. multiple doorbells / letterboxes / bins, may look like a hotel but not be operating as one)
Property characteristics (e.g. terrace house, number of storeys)
Approximate age of property
Overall quality of constuction

Section 2: Condition & Management

Score Rating		Additional comment if red or amber (brief justification / example)
Roof		
Chimney		
Rainwater goods		
External walls		
Windows		(note material and whether double glazed if visible)
External doors		
Garden Areas		

Boundary fencing / walls		
Parking area		
Structural damage		
		Maintenance
Disrepair or maintenance issues		
Recent maintenance		
		Management
Post / mail		
Bins		

Section 3: Safety & Security

Score Rating		Additional comment if red or amber (brief justification / example)
Safety issues		(e.g. blocked entrance, wiring, fire hazards)
Security issues		(e.g. with doors, windows, gates other features)
Suitable lighting		

Section 4: Surrounding Environment

Score Rating		Additional comment if red or amber (brief justification / example)
Waste issues		(e.g. rubbish piling up)
Pest issues		(e.g. rats visible, traps visible)
Parking issues		
Vandalism issues		(e.g. graffiti, broken glass)
Local character issues		(e.g. is the HMO badly kept and affecting the surrounding residential dwellings, other HMOS, guesthouses, businesses etc.)
Tenant action issues		(e.g. groups congregating, smoking shelters present (if so, where in relation to other properties?), and people congregating)
Other issues		(anything else)

Appendix 4.1: Mapping Approach for Surveys

Core sample

Ward	LSOA	OA	HMOs	Rooms	PRS	IMD
Devonshire	E01020912	E00106154	21	173	86%	10%
	E01020910	E00106145	25	129	62%	20%
	E01020912	E00106149	14	104	75%	10%
	E01020911	E00106153	14	97	52%	20%
	E01020911	E00106132	12	103	75%	20%
Meads	E01020937	E00106275	5	121	N/A	30%
	E01020935	E00106260	12	64	65%	40%
Upperton	E01020968	E00106441	5	30	64%	50%

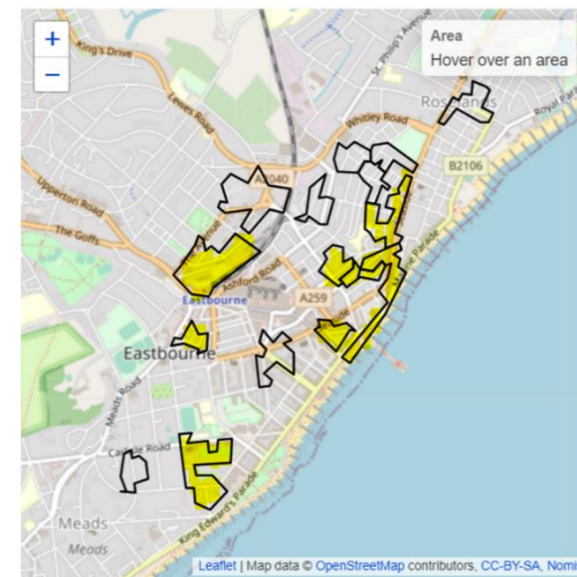
Control sample

Ward	LSOA	OA	HMOs	Rooms	PRS	IMD
Devonshire	E01020914	E00106135	1	5	60%	40%
	E01020914	E00106176	1	6	49%	40%
	E01020915	E00106170	1	5	41%	40%
	E01020914	E00106133	2	10	44%	40%
	E01020916	E00106143	2	11	47%	50%
Meads	E01020936	E00106264	3	22	50%	50%
	E01020932	E00106249	1	6	18%	50%
Upperton	E01020966	E00106428	1	11	44%	40%

Notes:

- The core sample includes the Census output areas (OAs) with the highest concentration of HMOs in Eastbourne.
- It includes at least one OA from each of the three wards where HMOs are prevalent. More surveys are taken in Devonshire, where there are more HMOs.
- A target number of surveys will be conducted in each postcode area within each OA for an even spread. The OAs in each ward are listed in priority order so that the most representative are sampled first, moving on to the next if more respondents are needed.
- Concentration of HMOs is considered in terms of the number of properties and the total number of rooms. This is taken from the register of licensed properties. Data is not yet available on the location of unlicensed HMOs.
- A control sample mirrors the approach of the core sample, for areas with low concentrations of HMOs.
- The same number of OAs is identified for each ward, with similar characteristics: the proportion of households in the private rented sector (PRS) and the relevant LSOA's index of multiple deprivation (IMD) score, here representing the percentage most deprived.

The map shows the selected OAs. Those highlighted yellow are in the core sample.



Appendix 4.2: Survey Form

Introduction

AECOM on behalf of Eastbourne Council is carrying out research on what it is like to live in this area and about the quality of housing in this area.

The survey will be carried out according to the Market Research Society’s Code of Conduct and Data Protection Laws. All data you provide is held securely and your individual answers will not be provided to Eastbourne Council. Your answers will be combined (aggregated) with other responses in a report to Eastbourne Council.

PRIVACY AND CONSENT

Participation in the survey is entirely voluntary.

More information about how your data is stored and used, including how to request for your data to be deleted can be found online at aecom.com/privacy-policy/

Would you like to take part and if yes, can you confirm that you are at least 18 years old?

1. Yes
2. No: householder and other members of the household declined

If no: Interviewer to check if any other household members are available for interview

ASK ALL
SINGLE CODE

Consent	Do you wish to continue on with the survey? (Tick one only)	
	Yes <input type="checkbox"/> ₁ [Continue]	No <input type="checkbox"/> ₂ [Thank and Close]

Screening Questions

ASK ALL
SINGLE CODE

S1. Are you aged 18 or over?

- Yes 1 Continue
- No 2 Thank and close

ASK ALL

SINGLE CODE

S2. Which of these age groups are you in? (SHOWCARD A)

16-17	1
18-24	2
25-34	3
35-44	4
45-54	5
55-59	6
60-64	7
65-74	8
75+	9
Refused	10

ASK ALL

SINGLE CODE

S3. How would you describe your gender? (SHOWCARD B)

Man	1
Woman	2
Non-binary / gender fluid	3
In another way	4
Prefer not to say	5

ASK ALL

SINGLE CODE

S4. How long have you been living in this area? (SHOWCARD C)

Less than a year	1
1 but not 3 years	2
3 but not 5 years	3
5 but not 10 years	4
10 but not 15 years	5
15 but not 20 years	6
20 but not 30 years	7
30 but not 40 years	8
40 but not 50 years	9
50 years or more	10

Current residence

ASK ALL

SINGLE CODE

R1. How long have you been living in this property? (SHOWCARD C)

Less than a year	1
1 but not 3 years	2
3 but not 5 years	3
5 but not 10 years	4
10 but not 15 years	5
15 but not 20 years	6
20 but not 30 years	7
30 but not 40 years	8
40 but not 50 years	9
50 years or more	10

ASK ALL

SINGLE CODE

R2. Including yourself, how many people USUALLY live in this household?

A household is a single person living alone or a group of people who share cooking facilities and share a living room, sitting room, kitchen or dining room. INCLUDE STUDENTS, WHETHER AT HOME DURING VACATION OR AWAY AT COLLEGE/UNIVERSITY

Adults _____

Children _____

ASK ALL

SINGLE CODE

R3. Do you.....?

Own the house (outright or with a mortgage or loan)	1
Part own and part rent (shared ownership)	2
Rent (with or without housing benefit)	3
Live here rent-free	4

ASK IF R3 = 2 or 3

SINGLE CODE

R4. Who is your landlord?

Housing association, housing cooperative, charitable trust, registered social landlord	1
Council or local authority	2
Private landlord or letting agency	3
Employer or household member	4
Relative or friend of a household member	5
Other	6

ASK ALL
SINGLE CODE

R5. How many bedrooms does the property have?

1	1
2	2
3	3
4	4
5	5
6	6
7	7
8+	8

ASK ALL
SINGLE CODE

R6. How many bathrooms does the property have?

1	1
2	2
3	3
4	4
5	5
6	6
7	7
8+	8

DISCLAIMER:

Any answers given in relation to renting should be answered honestly and fully. This is a reminder that all answers given are confidential and cannot be traced back to individual respondents. Therefore, if you consider yourself to be the only legal tenant to rent the house but have other individuals living with you (family/ non-family members) then your answer to question R3 should be answer option 4.

ASK IF R3 = 2 or 3
SINGLE CODE PER ROW

R7. How would you rate the following in your property: (SHOWCARD D)

	Very good	good	Neither	Poor	Very poor	Don't know
bathroom facilities						
kitchen facilities						
bedroom facilities						

ASK IF R3 = 2 or 3

SINGLE CODE (SHOWCARD E)

R8. How satisfied or dissatisfied are you that your landlord fulfils their role and responsibilities with your property?

Very satisfied	1
Satisfied	2
Neither satisfied nor dissatisfied	3
Dissatisfied	4
Very dissatisfied	5

Current area / neighbourhood

ASK ALL

SINGLE CODE

N1a On a scale of 0 to 10, where 0 is dissatisfied and 10 is satisfied, how satisfied are you with your neighbourhood?

ASK ALL

Open ended

N1b. Why do you say this?

ASK ALL

SINGLE CODE

N2 On a scale of 0 to 10, where 0 is not at all and 10 is very much, how much do you feel the neighbourhood suits you and your lifestyle?

ASK ALL

Open ended

N2b. Why do you say this?

ASK ALL

SINGLE CODE PER ROW

N3a. To what extent do think the: (SHOWCARD F)

	Very clean	Clean	Neither	Unclean	Very unclean	Don't know
...streets in my neighbourhood area are...						

ASK ALL

SINGLE CODE PER ROW

N3b. To what extent do you think: (SHOWCARD G)

	Very safe	Safe	Neither	Unsafe	Very unsafe	Don't know
...the neighbourhood / area as a place to live is safe during the day						

ASK ALL

SINGLE CODE PER ROW

N3c. To what extent do think: (SHOWCARD G)

	Very safe	Safe	Neither	Unsafe	Very unsafe	Don't know
...the neighbourhood / area as a place to live is safe during the evening / night						

ASK ALL

SINGLE CODE PER ROW

N3d. To what extent do think that: (SHOWCARD H)

	Strongly agree	Agree	Neither	Disagree	Strongly disagree	Don't know
There is a sense of community in my neighbourhood						

ASK ALL

SINGLE CODE PER ROW

N4. In general, what kind of neighbourhood would you say you live in – would you say it is a neighbourhood in which people do things together and try and help each other, or one in which people mostly go their own way?

- Help each other 1
- Go their own way 2
- Mixture 3
- Don't know 4

ASK ALL

SINGLE CODE PER ROW (SHOWCARD I)

N5. Suppose you lost your (purse/wallet) containing your address details, and it was found in the street by someone living in this neighbourhood. How likely is it that it would be returned to you with nothing missing?

- Very likely 1
- Quite likely 2
- Not very likely 3
- Not at all likely 4

ASK ALL

SINGLE CODE PER ROW

N6. Still thinking about your street or area, how much of a problem: (SHOWCARD J)

	Very big problem	Fairly big problem	Not a very big problem	Not a problem at all	It happens but not a problem	Don't know
...are people being drunk or rowdy in public places?						
...is rubbish or litter lying around?						
...are vandalism, graffiti and other deliberate damage to property or vehicles?						
...are people using or dealing drugs?						
...are people being attacked or harassed because of their skin colour, ethnic origin or religion?						
...are groups hanging around on the street?						
...are troublesome neighbours?						
...is parking in the area?						

ASK IF codes 1 or 2 @N5 for any row

OPEN ENDED

N6b. what causes the issues in the area? Why do you say it is a big problem / very big problem?

Further comments

ASK ALL

Open ended

P1. Do you have any further comments on where you live, your residence or anything else we have discussed today in this survey?

Demographics

ASK ALL

SINGLE CODE (SHOWCARD K)

D1. What is your employment status?

- Working full-time (30 + hours) 1
- Working part-time (16-30 hours) 2
- Working part-time (less than 16 hours) 3
- Unpaid work, including regular voluntary/work experience 4
- In full-time education (student) 5
- In part-time education (student) 6
- Retired 7
- Looking after the home/family 8
- Unemployed / not working 9
- Long term sick or disabled 10
- Refused 11

ASK ALL

SINGLE CODE

D2. Which of these best describes your ethnicity? (SHOWCARD L)

White	English/Welsh/ Scottish/ Northern Irish/ British	1
	Irish	2
	Gypsy or Irish Traveller	3
	Any other White background	4
Mixed / multiple ethnic background	White and Black Caribbean	5
	White and Black African	6
	White and Asian	7
	Any other Mixed / multiple ethnic background	8
Asian	British	9
	Indian	10
	Pakistani	11
	Bangladeshi	12
	Chinese	13
	Any other Asian background	14
Black	British	15
	African	16
	Caribbean	17
	Any other Black background	18
Arab		19
Any other Ethnic group		20
Prefer not to say		99

ASK ALL

SINGLE CODE

D3. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? Include problems due to old age

Yes, limited a lot	1
Yes, limited a little	2
No	3
Prefer not to say	4

ASK ALL

SINGLE CODE (SHOWCARD M)

D4. We need a general idea of household income to gain a better understanding of the different levels of income across the area.

Please take into account all sources of income such as:

- Wages/salary, income from self-employment
- Pensions, child benefit, mobility/disability allowances
- Other state benefits such as family credit, unemployment benefit, housing benefit, sickness/invalidity benefit, maternity benefit, income support etc.
- Saving/investment interest, income from rent, capital gains tax etc
- Other income such as alimony, annuity, grants etc

	Annual	Or Monthly	Or Weekly
D	less than £5,000	less than £400	Less than £100
X	£5,000 - £9,999	£400 - £799	£100 - £199
R	£10,000 - £14,999	£800 - £1,199	£200 - £299
S	£15,000 - £19,999	£1,200 - £1,599	£300 - £399
Z	£20,000 - £24,999	£1,600 - £1,999	£400 - £499
Y	£25,000 - £34,999	£2,000 - £2,999	£500 - £699
A	£35,000 - £49,999	£3,000 - £4,199	£700 - £999
W	£50,000 - £74,999	£4,200 - £6,199	£1,000 - £1,499
H	£75,000 or more	£6,200 or more	£1,500 or more

INTERVIEWER ONLY – RECORD DETAILS AS APPROPRIATE

11. Which of the following best describes the selected flat or house? (CIRCLE ONE)							
1	Detached house/bungalow	3	Terraced house/end of terrace	5	Flat or maisonette - part of converted house/other	7	Caravan or mobile home
2	Semi-detached house/bungalow	4	Flat or maisonette - purpose built	6	Room or rooms (i.e. house in multiple occupation)	8	Some other kind of accommodation

12. Which of the following best describes the condition of residential properties in the area (i.e. within line of sight from the sampled address)? (CIRCLE ONE) [REFER TO SHOWCARD]									
1	Mainly good	2	Mainly fair	3	Mainly bad	4	Mainly very bad	5	Unable to obtain information

13. How is the external condition of the selected flat or house relative to other residential properties in the area (i.e. within line of sight from the sampled address)? (CIRCLE ONE) [REFER TO SHOWCARD]									
1	Better	2	About the same	3	Worse	4	Does not apply	5	Unable to obtain information

Appendix 4.3: Detailed Survey Result Tables

Ethnicity

		Sample type			
		Core		Control	
		Count	Column N %	Count	Column N %
Which of these best describes your ethnicity?	White English / Welsh / Scottish / Northern Irish / British	142	63.4%	168	83.2%
	White Irish	3	1.3%	1	0.5%
	White Gypsy or Irish Traveller	0	0.0%	0	0.0%
	Any other white background	38	17.0%	16	7.9%
	Mixed / Multiple - White / Black British	2	0.9%	0	0.0%
	Mixed / Multiple - White / Black Caribbean	1	0.4%	1	0.5%
	Mixed / Multiple - White / Black African	0	0.0%	0	0.0%
	Mixed / Multiple - White and Asian	3	1.3%	0	0.0%
	Mixed / Multiple - Any other mixed / multiple ethnic background	1	0.4%	2	1.0%
	Asian - British	1	0.4%	2	1.0%
	Asian - Indian	10	4.5%	4	2.0%
	Asian - Pakistani	0	0.0%	1	0.5%
	Asian - Bangladeshi	0	0.0%	1	0.5%
	Asian - Chinese	2	0.9%	0	0.0%
	Any other Asian background	3	1.3%	1	0.5%
	Black - British	1	0.4%	0	0.0%
	Black - African	5	2.2%	2	1.0%
	Black - Caribbean	2	0.9%	1	0.5%
	Any other black background	0	0.0%	0	0.0%
	Arab	1	0.4%	0	0.0%
	Any other ethnic group	5	2.2%	1	0.5%
	Prefer not to say	4	1.8%	1	0.5%
	Total	224	100.0%	202	100.0%

Income

		Sample type			
		Core		Control	
		Count	Column N %	Count	Column N %
Household Income	D - less than £5,000 (Annual) / less than £400 (Monthly) / less than £100 (Weekly)	14	6.3%	10	5.0%
	X - £5,000 - £9,999 (Annual) / £400 - £799 (Monthly) / £100 - £199 (Weekly)	31	13.8%	9	4.5%
	R - £10,000 - £14,999 (Annual) / £800 - £1,199 (Monthly) / £200 - £299 (Weekly)	28	12.5%	7	3.5%
	S - £15,000 - £19,999 (Annual) / £1,200 - £1,599 (Monthly) / £300 - £399 (Weekly)	20	8.9%	16	7.9%
	Z - £20,000 - £24,999 (Annual) / £1,600 - £1,999 (Monthly) / £400 - £499 (Weekly)	17	7.6%	16	7.9%
	Y - £25,000 - £34,999 (Annual) / £2,000 - £2,999 (Monthly) / £500 - £699 (Weekly)	35	15.6%	25	12.4%
	A - £35,000 - £49,999 (Annual) / £3,000 - £4,199 (Monthly) / £700 - £999 (Weekly)	18	8.0%	29	14.4%
	W - £50,000 - £74,999 (Annual) / £4,200 - £6,199 (Monthly) / £1,000 - £1,499 (Weekly)	11	4.9%	10	5.0%
	H - £75,000 or more (Annual) / £6,200 or more (Monthly) / £1,500 or more (Weekly)	8	3.6%	5	2.5%
	Refused	42	18.8%	75	37.1%
	Total	224	100.0%	202	100.0%

Working Status

		Sample type			
		Core		Control	
		Count	Column N %	Count	Column N %
What is your employment status?	Working full-time (30 + hours)	108	48.2%	104	51.5%
	Working part-time (16-30 hours)	26	11.6%	37	18.3%
	Working part-time (less than 16 hours)	2	0.9%	0	0.0%
	Unpaid work, including regular voluntary/work experience	0	0.0%	0	0.0%
	In full-time education (student)	3	1.3%	1	0.5%
	In part-time education (student)	2	0.9%	0	0.0%
	Retired	48	21.4%	45	22.3%
	Looking after the home/family	8	3.6%	6	3.0%
	Unemployed / not working	18	8.0%	5	2.5%
	Long term sick or disabled	9	4.0%	4	2.0%
	Refused	0	0.0%	0	0.0%
	Total	224	100.0%	202	100.0%

Disability

		Sample type			
		Core		Control	
		Count	Column N %	Count	Column N %
Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? Include problems due to old age	Yes, limited a lot	23	10.3%	16	7.9%
	Yes, limited a little	30	13.4%	14	6.9%
	No	165	73.7%	170	84.2%
	Prefer not to say	6	2.7%	2	1.0%
	Total	224	100.0%	202	100.0%

Type of property

		Sample type			
		Core		Control	
		Count	Column N %	Count	Column N %
Which of the following best describes the selected flat or house?	Detached house / bungalow	2	0.9%	2	1.1%
	Semi-detached house / bungalow	6	2.7%	25	14.1%
	Terraced house / end of terrace	69	30.9%	107	60.5%
	Flat or maisonette - purpose built	130	58.3%	38	21.5%
	Flat or maisonette - part of converted house / other	14	6.3%	2	1.1%
	Room or rooms (i.e. house in multiple occupation)	1	0.4%	1	0.6%
	Caravan or mobile home	0	0.0%	0	0.0%
	Some other kind of accommodation	1	0.4%	2	1.1%
	Total	223	100.0%	177	100.0%

Condition of property

		Sample type			
		Core		Control	
		Count	Column N %	Count	Column N %
Which of the following best describes the condition of residential properties in the area (i.e. within line of sight from the sampled address)?	Mainly good	110	49.1%	114	56.4%
	Mainly fair	103	46.0%	52	25.7%
	Mainly bad	8	3.6%	13	6.4%
	Mainly very bad	3	1.3%	10	5.0%
	Unable to obtain information	0	0.0%	13	6.4%
	Total	224	100.0%	202	100.0%

External condition of property

		Sample type			
		Core		Control	
		Count	Column N %	Count	Column N %
How is the external condition of the selected flat or house relative to other residential properties in the area (i.e. within line of sight from the sampled address)?	Better	98	43.8%	75	37.1%
	About the same	105	46.9%	93	46.0%
	Worse	19	8.5%	34	16.8%
	Does not apply	0	0.0%	0	0.0%
	Unable to obtain information	2	0.9%	0	0.0%
	Total	224	100.0%	202	100.0%

Appendix 6.1: Action Taken by Other Local Planning Authorities

1. The table below identifies the action taken to manage the spread and quality of HMOs (beyond mandatory licensing) by a number of local authorities, and notes the form and strength of supporting evidence cited. The supporting evidence summarised here may not be complete due to gaps in what has been published on the relevant councils' websites and the dated nature of some supporting studies.

2. The following local authorities are considered:
 - Brighton & Hove City Council (East Sussex)
 - Hastings Borough Council (East Sussex)
 - Thanet District Council (Kent)
 - Doncaster City Council (South Yorkshire)
 - Portsmouth City Council (Hampshire)
 - Bournemouth, Christchurch, & Poole Council (Dorset)
 - Bristol City Council (Bristol)
 - Northampton Borough Council (Northamptonshire)

LPA	Action Taken	Evidence
<p>Brighton & Hove City Council</p>	<p>Article 4 Direction¹ - requires planning permission for all houses in the local authority to change from Use Class C3 to Use Class C4. Planning permission was always required from Use Class C3 to sui generis.</p> <p>There was an additional licensing scheme in Brighton & Hove, requiring all HMOs to be licensed. This ended on 28/02/2023 and it is currently being considered whether another scheme is necessary.</p> <p>Adopted (2016) Brighton & Hove City Plan Part One – Policy CP21 Student Accommodation and Houses in Multiple Occupation</p> <p><i>To meet increasing accommodation demands from students and to create mixed, healthy, and inclusive communities, the Council will support the provision of additional purpose built accommodation and actively manage the location of new Houses in Multiple Occupation. The Council will continue to work closely with the two universities and other education providers to achieve these goals.</i></p> <p><i>In order to support mixed and balanced communities and to ensure that a range of housing need continue to be accommodated throughout the city, applications for new build HMO, and applications for the change of use to a Class C4 use, a mixed C3/C4 use, or sui generis HMO use will not be permitted where:</i></p> <p><i>More than 10% of dwellings within a radius of 50 metres of the application site are already in use as Class C4, mixed C3/C4, or other types of HMO in sui generis use.</i></p>	<p>To aid implementation of the Article 4 direction, the Council maintains a database of properties in HMO use, including small HMO (Use Class C4 – 3-6 households), mixed C3/C4 uses, and larger sui generis HMO uses.</p> <p>Evidence for Local Plan policies</p> <p>Local Plan Part 2 notes that the high number of HMOs is partly due to housing costs and partly due to the supply of purpose built student accommodation not matching past expansion of student numbers.</p> <p>Student Accommodation Study 2019 (part of evidence base for Local Plan Part 2). This explores demand for private rented sector accommodation due to gap between student numbers and purpose built student accommodation. The report notes that number of university students in the PRS is expected to peak 2017/18.</p>

i. ¹ <https://www.brighton-hove.gov.uk/sites/default/files/2021-08/Article%204%20Direction.pdf>

LPA	Action Taken	Evidence
	<p>Adopted (2022) Brighton & Hove City Plan Part Two – Policy DM7 Houses in Multiple Occupation (HMOs)</p> <p><i>Planning permission will be granted for the conversion of sui generis houses in multiple occupation to self-contained family homes (Use Class C3).</i></p> <p><i>Applications for new build HMOs, and applications for the change of use to a C4 use, a mixed C3/C4 use, or to a sui generis HMO use, will be permitted where the proposal complies with City Plan Part One and all of the following criteria are met:</i></p> <p><i>Fewer than 20% of dwellings in the wider neighbourhood area are already in use as HMOs;</i></p> <p><i>The proposal does not result in a non-HMO dwelling being sandwiched between two existing HMOs in a continuous frontage;</i></p> <p><i>The proposal does not lead to a continuous frontage of 3 or more HMOs;</i></p> <p><i>The internal and private outdoor space standards provided comply with Policy DM1;</i></p> <p><i>Communal living space and cooking and bathroom facilities are provided appropriate in size to the expected number of occupants.</i></p>	
<p>Hastings Borough Council</p>	<p>Additional licensing of HMOs in the wards of Braybrooke, Gensing, Castle, and Central St Leonards. Came into force 04/05/2018 and ceased 03/05/2023. Requires all HMOs to be licensed, capturing smaller ones. A previous scheme ran from 2011 to 2016.</p> <p>Previous additional licensing scheme ran from 19/09/2011 to 18/09/2016 and due to the success extended the scheme to the above.</p>	<p>A Report on New Additional Licensing Scheme to Cabinet in October 2017 – evidence to extend the scheme after the first term.</p> <p>Aims to continue to tackle poor standards in HMOs and provide greater protection for tenants.</p> <p>Housing stock consists of many large houses converted into self-contained flats of poor quality that fall into HMOs.</p>

LPA	Action Taken	Evidence
	<p>Article 4 Direction came into effect on 02/07/2012 to require planning permission from Use Class C3 to Use Class C4.</p> <p>Adopted (2014) Hastings Planning Strategy – Policy H4 Houses in Multiple Occupation</p> <p><i>In order to support mixed and balanced communities and maintain an appropriate housing mix within the Borough, application for change of use from:</i></p> <p><i>A Class C3 (dwelling house) to a Class C4 (HMO), or;</i></p> <p><i>A Class C3 (dwelling house) to a HMO in sui generis use</i></p> <p><i>Will not be permitted where more than 10% of the total numbers of properties within a 100m radius of the application property are already in use as either Class C4, or other types of HMO in a sui generis use. This policy will not apply to social housing, care homes, children’s homes, bail hostels, and properties occupied by students which are managed by an educational establishment. This policy will not apply to households who have foreign students staying as guests for a set period of time.</i></p>	<p>2011-2016 scheme licensed 911 HMOs in 4 wards and improvements to 465 properties. Exit review undertaken along with housing stock condition survey. Consultation was undertaken, with 70% of tenants supporting further additional licensing (although 73% of landlords opposed).</p> <p>Cabinet recommended to adopt an additional licensing scheme for HMOs, primarily S257, in 4 wards.</p> <p>For the Article 4 Direction public consultation was undertaken 01/07/2011-12/08/2011. There were 7 representations received (4 in favour, 3 against) which were presented by the Borough Planning Officer to the Cabinet. Cabinet unanimously resolved for Article 4 Direction to come into effect to cover the whole Borough².</p> <p>Hastings & St Leonards Housing Strategy 2016-2019³ discusses HMOs, including the following:</p> <p>Estimates the stock of HMOs (2,800) and the concentration (85% in 4 wards). HMOs comprise 8% of the housing stock in Hastings compared to 2% nationally.</p> <p>Identifies that many HMOs fail to meet the Decent Homes Standard and that strategic initiatives that combine licensing, enforcement, and acquisition will be important in the Council’s aims of driving up housing standards and in turn improving the health and wellbeing of residents and neighbourhoods.</p>
Thanet District Council	<p>Selective licensing from 2011-2016 and 2016-2021. Took place in electoral wards of Margate Central and Cliftonville West (area increased</p>	<p>Cabinet Report for the second selective licensing designation – <i>Selective Licensing in Margate Central and Cliftonville West: Proposal to make a</i></p>

ii. ² https://www.hastings.gov.uk/content/planning/planning_advice/info_advice/pdfs/hmo_cabinet_111031.pdf

iii. ³ https://www.hastings.gov.uk/content/my_council/decisions_how/policies_strategies/pdfs/housing_strategy

LPA	Action Taken	Evidence
	<p>slightly in second scheme). All privately rented properties were required to be licensed, not just HMOs. Last scheme expired on 20/04/2021 and as of yet has not been renewed.</p> <p>Adopted (2020) Local Plan – Policy HO19 Houses in Multiple Occupation</p> <p><i>Proposals for HMOs, either through conversion of existing buildings or new built development, will not be permitted in those parts of the Cliftonville and Margate Central Wards as illustrated on the policies map.</i></p> <p><i>Elsewhere proposals will be permitted where the development:</i></p> <p><i>Does not give rise to an unacceptable impact on the living conditions of neighbouring residents through noise or general disturbance;</i></p> <p><i>Does not result in an intensification or concentration of such uses which is detrimental to the amenity and character of the neighbourhood (having regard to the criteria set out in para 11.34 by way of guidance);</i></p> <p><i>Provides suitable arrangements for car parking, or adequate on-street parking is available within the vicinity of the site; and</i></p> <p><i>Provides suitable arrangements for the storage and collection of waste.</i></p> <p>Adopted (2010) Cliftonville Development Plan Document – Policy CV1 One Bedroom Flats</p> <p><i>Proposals to provide single bedroom flatted accommodation, bed-sits, and non-self-contained accommodation (houses in multiple occupation)</i></p>	<p><i>further selective licensing designation (19/01/2016)</i>⁴. This is a significant report (over 100 pages) including a 50 page consultation document. Sets out Council position, results of public consultation, review of previous scheme, and acts as evidence base for whether selective licensing should continue.</p> <p>Key information outlined in the report:</p> <p>First scheme there were initial challenges in progress (including a legal challenge to the scheme⁵ and general non-compliance) but there are now fewer empty properties, less anti-social behaviour, and a greater number of well managed and safe homes.</p> <p>Looking to increase the geography of the scheme slightly.</p> <p>From consultation, 72% of respondents were in support of selective licensing, 18% against, and 10% unsure.</p> <p>Key issues highlighted in the consultation were waste problems, crime, anti-social behaviour, poor housing conditions, overcrowding, absent landlords, problem tenants, etc.</p> <p>Outlines licensing fees for different types of private rented dwellings (including HMOs).</p>

iv. ⁴ <https://www.thanet.gov.uk/wp-content/uploads/2018/02/Selective-Licensing-Proposal-2016-21.pdf>

⁵ A landlord association lodged a judicial review alleging that the original selective licensing scheme was unlawful as the geography decided upon did not meet the criteria for low housing demand or anti-social behaviour. The High Court found in favour of Thanet District Council and the scheme was deemed to be lawful as both sets of legal tests had been proved.

LPA	Action Taken	Evidence
	<p><i>within the DPD Plan area will not be permitted. This includes provision by way of conversion of existing buildings and by way of new build.</i></p> <p>Policy CV2 Retention of Family Housing</p> <p><i>Planning permission for the subdivision of properties, currently or last lawfully used as single-family accommodation, or by a single household, will not be permitted.</i></p>	
<p>Doncaster City Council</p>	<p>Adopted (2021) Local Plan – Policy 9 Houses in Multiple Occupation</p> <p><i>The growth in the number of HMOs in parts of the Borough has led to significant impacts on existing communities linked to the over concentration of people and pressures on local infrastructure. There are also concerns around the quality of living for occupants of these dwellings. Proposals for HMOs will only be supported under very strict circumstances where:</i></p> <p><i>The internal standards of the property are suitable for multiple occupation, including bedrooms with good soundproofing, privacy, outlook, light, ventilation, and have good communal facilities for washing, preparation, and consumption of food;</i></p> <p><i>External communal areas and facilities are of sufficient size and standard to satisfactorily accommodate waste and recycling bins, safe and secure cycle storage, and on-site parking (unless it can be demonstrated that the site is suitably located and therefore justifies reduced levels of on-site parking);</i></p> <p><i>The overall size of the dwelling is sufficient to provide proper and adequate accommodation and living space for the number of residents intended to be accommodated;</i></p>	<p>Council website states that for the Article 4 Direction a <i>huge amount of data collection work and public consultation aimed at improving the quality of housing in the Central Wards of Doncaster</i> was undertaken by the Council.</p> <p>Additional Licensing and Article 4 Direction Consultation Document – Houses in Multiple Occupation in parts of Doncaster⁶. October 2017. This found:</p> <p>The Council are aware of nearly 1,000 HMO although expect this to be substantially higher. Of these, 80% are located in the central wards.</p> <p>At the time of the report less than 15% of the HMOs the Council Enforcement Team were aware of were of sufficient size to fall under mandatory licensing (although at this time HMOs had to be 3 storeys to fall under mandatory licensing, which is no longer the case).</p> <p>The HMO stock is typically older with a greater tendency to have structural problems and poor energy efficiency.</p> <p>In the 5 years previous to the report, there was a substantial increase in concerns raised by residents in relation to overcrowding and anti-social behaviour.</p>

v. ⁶ <https://dmbcwebstolive01.blob.core.windows.net/media/Default/BusinessInvestment/Additional%20LicensingA4%20consultation%20report-October2017.pdf>

LPA	Action Taken	Evidence
	<p><i>The existing dwelling or building is capable of conversion without causing harm to the area or the amenity of nearby residents particularly with noise and disturbances or over-looking, and, in areas of flood risk, do not result in ground-floor or basement level self-contained rooms; and</i></p> <p><i>The proposal would not result in an over-concentration of HMOs within a community/locality/street/row, or result in a significant impact to local amenities. Proposals must not create:</i></p> <p><i>More than two HMOs side by side; or</i></p> <p><i>The sandwiching of a single self-contained house or flat between two HMOs; or</i></p> <p><i>More than 2 HMOs within a run of 20 properties on one side of the road; or</i></p> <p><i>More than 1 HMO in a road of fewer than 20 properties on one side of the road.</i></p> <p><i>The Council will utilise all of its powers available, including licensing and enforcement, to ensure the negative impacts of HMOs are managed and that our communities are not negatively impacted by the provision of such accommodation.</i></p> <p>Article 4 Direction came into force 14/10/2019 and applies to land within the areas of Town, Town Fields, Wheatley, Hexthorpe, Balby, Wheatley Hills, Intake, and Belle Vue. Properties in this area now have to have planning permission to convert from Use Class C3 to Use Class C4.</p> <p>The Council introduced additional licensing on 01/10/2018 which applies to HMOs not previously captured by mandatory licensing. It applies to parts of Doncaster Town Centre, Hyde Park, Balby North,</p>	<p>57% of known HMOs attracted complaints/required formal intervention from the Enforcement Team in previous 5 years compared to 9.4% for other domestic properties in the time period.</p>

LPA	Action Taken	Evidence
	<p>Wheatley, and Intake. In this circumstance a license is required for HMOs with 4 or more occupiers and Section 257 HMOs.</p>	
<p>Portsmouth City Council</p>	<p>The Council has an Article 4 Direction which came into force 01/11/2011. This requires planning permission for a change of use from C3 to C4.</p> <p>There was additional licensing in place for smaller properties within PO1, PO4, and PO5 but the 5-year designation has now ended (2013-2018). The additional licensing fee to landlords was used to employ an enforcement officer to visit all properties every 5 years and follow up on problem properties. The Council is planning to license all HMOs in the city from 01/09/2023.</p> <p>Houses in multiple occupation (HMOs) – Ensuring mixed and balanced communities. Supplementary Planning Document (SPD) – October 2019⁷.</p> <p>Adopted (2012) Portsmouth Core Strategy – PCS20 Houses in Multiple Occupation (HMOs): Ensuring Mixed and Balanced Communities</p> <p><i>In order to support mixed and balanced communities, and to ensure that a range of household needs continue to be accommodated throughout the city, applications for changes of use to a HMO will only be permitted where the community is not already imbalanced by a concentration of such uses or where the development would not create an imbalance. For the purposes of this policy, dwellings in use as Class C4, mixed C3/C4 use, and HMOs in sui generis use will be considered to be HMOs.</i></p>	<p>Evidence for the SPD - Shared housing in Portsmouth – An assessment of demand, supply, and community impacts – March 2012⁸. This:</p> <p>Aimed to inform a percentage threshold for use in determining planning applications for HMOs.</p> <p>Identified that in 2011 there were 4,312 HMOs, accounting for 5.9% of private sector dwellings, increasing from 5.1% in 2007 and 3.9% in 2003. It also identified the areas with the highest concentrations of HMOs.</p> <p>Identifies that the potential high demand for HMOs is pricing out of the market those wishing to buy for non-HMO use (particularly first time buyers).</p> <p>Assessed demand by occupant type, including students, those claiming LHA, and those on the social housing waiting list.</p> <p>Determined the negative impacts of HMO concentrations on communities including increased house prices, more transient populations, less community cohesion, etc.</p> <p>Consultation with city residents and complains received by the Council consistently pointed to HMOs as the source of noise, traffic, parking, and waste problems.</p> <p>Looks at potential future demand (in relation to national changes (e.g. to LHA, increased university fees and the impact on student numbers)).</p>

vi. ⁷ <https://www.portsmouth.gov.uk/wp-content/uploads/2022/02/Houses-in-multiple-occupation-HMO-spd-Accessible.pdf>

vii. ⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-shared-housing-in-portsmouth-report.pdf>

LPA	Action Taken	Evidence
	<p>Emerging (Reg 18 2021) Portsmouth Local Plan 2038 – H3 Houses in Multiple Occupation</p> <p><i>In order to support mixed and balanced communities and ensure that a range of household needs continue to be accommodated within the city, including development to increase the occupancy of an existing HMO, planning applications for new HMOs, and changes of use to a HMO, will only be granted planning permission where:</i></p> <p><i>Less than 10% of residential properties within a 50m radius of the area surrounding the application property are in existing use as a HMO;</i></p> <p><i>Development avoids harm to the amenity of residents; and</i></p> <p><i>Development takes account of the HMO Supplementary Planning Guidance.</i></p> <p>Emerging (Reg 18 2021) Portsmouth Local Plan 2038 – H6 Residential Space Standards</p> <p><i>Where planning permission is required, development proposals for new homes (including change of use or conversions) should ensure that the layout and size are suitable to meet the amenity needs of future occupiers. Planning permission will be granted for new homes that:</i></p> <p><i>Meet as a minimum the nationally described space standards (or future equivalent);</i></p> <p><i>Provide sufficient private and/or communal outdoor amenity space / balcony space proportionate to the number of bedrooms. Where development is in close proximity to public open space, reduced provision may be acceptable;</i></p> <p><i>Provide sufficient storage space for reduce and recycling;</i></p>	<p>Tests the impacts of a 10% threshold on HMOs.</p> <p>City Council Private Rented Sector Housing Conditions Survey (2008) informed adopted policy.</p> <p>LHNA informed emerging Local Plan policies – this identified a need to accommodate an additional 2,545 single person households (historically met through 1-bedroom dwellings and HMOs). It identifies a continued demand for HMOs for those on low incomes as well as students and young professionals. Increased provision of PBSA may reduce student demand for HMOs.</p>

LPA	Action Taken	Evidence
	<p><i>Provide sufficient levels of weatherproof and secure bicycle parking (in accordance with levels set out in the Council's parking standards SPD).</i></p>	
<p>Bournemouth, Christchurch, and Poole</p>	<p>Bournemouth, Christchurch, and Poole Local Plan still at Issues and Options.</p> <p>Adopted (2018) Poole Local Plan – Policy PP14 Talbot Village Houses in Multiple Occupation</p> <p><i>Within the area of Talbot Village, proposals for a change of use from Use Class C3 to Use Class C4 will require planning permission as a consequence of the removal of permitted development rights through an Article 4 Direction. Proposals for a change of use to an HMO should demonstrate:</i></p> <p><i>Satisfactory arrangements for parking, bicycle storage, waste, and recycling; and</i></p> <p><i>That to prevent an over-concentration or 'clustering' of HMO properties that would result in an adverse impact upon the character and amenity of neighbouring properties or the surrounding residential area, there is not already, or the proposal would not result in more than 10% of dwellings within a 100 metre radius of the application property will be within Use Class C4 or sui generis HMO.</i></p> <p>Adopted (2012) Bournemouth Local Plan Core Strategy – Policy CS24 Houses of Multiple Occupation</p> <p><i>In order to encourage mixed and balanced communities, the change of use from a Use Class C3 dwellinghouse to a HMO, either Use Class C4 or sui generis, will only be permitted where no more than 10% of dwellings in the area adjacent to the application property are within a Use Class C4 or sui generis HMO use.</i></p>	<p>Dorset and BCP LHNA mentions students and HMOs but no clear determination of need or recommendations.</p>

LPA	Action Taken	Evidence
	<p><i>For the purpose of this policy the area adjacent to the application property is defined as:</i></p> <p><i>Road frontage lying within 100 metres either side of the application property;</i></p> <p><i>On the opposite site of the road – the property lying immediately opposite the application property and road frontage lying within 100 metres either side of this property;</i></p> <p><i>On the road to the rear – the property immediately to the rear of the application property and road frontage lying within 100 metres either side of this property;</i></p> <p><i>Road frontage on either side of any adjacent road, where this frontage lies within 100 metres of the application property.</i></p> <p>Article 4 Direction in all of the Bournemouth area and Talbot Village in the Poole are. Requires planning permission for C3 to C4. For the Bournemouth area this came into force in December 2011. For Talbot Village in the Poole area this came into force in May 2013.</p>	
<p>Bristol City Council</p>	<p>There is additional licensing in Central Bristol (covering wards of Ashley, Bishopston & Ashley Down, Central, Clifton, Clifton Down, Cotham, Easton, Hotwells & Harbourside, Lawrence Hill, Redland, Southville, and Windmill Hill. From 08/07/2019 to 2024 all privately rented HMOs in these areas will require a license.</p> <p>On 06/04/2022 additional licensing was extended to Horfield ward. In the wards of Bedminster and Brislington West additional and selective licensing was introduced, meaning most privately rented properties have to be licensed (not just HMOs).</p>	<p>Managing the development of houses in multiple occupation SPD Evidence Paper, August 2020⁹. This study:</p> <p>Identifies the probable drivers of demand for the supply of HMOs in Bristol (housing affordability, welfare reform, university expansion, etc.).</p> <p>Identifies that a range of work has been undertaken to support Article 4 and Local Plan policy, including estimating HMO numbers, mapping locations and densities, calculating HMOs as a proportion of dwelling stock, and reviewing qualitative evidence.</p>

viii. ⁹ <https://www.bristol.gov.uk/files/documents/2674-evidence-paper-august-2020/file>

LPA	Action Taken	Evidence
	<p>Adopted (2014) Site Allocations and Development Management Policies – Policy DM2 Residential Sub-Divisions, Shared, and Specialist Housing</p> <p><i>Proposals for:</i></p> <p><i>The sub-division of existing dwellings to flats;</i></p> <p><i>The conversion of existing dwellings or construction of new buildings to be used as HMOs;</i></p> <p><i>The intensification of existing HMOs;</i></p> <p><i>Specialist student housing; and</i></p> <p><i>Other forms of shared housing</i></p> <p><i>Will not be permitted where:</i></p> <p><i>The development would harm the residential amenity or character of the locality as a result of any of the following:</i></p> <p><i>Levels of activity that cause excessive noise and disturbance to residents; or</i></p> <p><i>Levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures; or</i></p> <p><i>Cumulative detrimental impact of physical alterations to buildings and structures; or</i></p> <p><i>Inadequate storage for recycling/refuse and cycles.</i></p> <p><i>The development would create or contribute to a harmful concentration of such uses within a locality as a result of any of the following:</i></p>	<p>Identifies that as of April 2019 there were 6,320 verifiable HMOs, a lower estimate, and that the geographic spread of HMOs has grown over time.</p> <p>Assesses community impacts, including noise, poor waste management, congested parking, erosion of community facilities, loss of social cohesion, and loss of family housing.</p> <p>Undertakes a threshold assessment and determines whether setting a limit to the % of homes within any given area being occupied as HMOs. Identifies that the majority of local authorities that do this identify 10% HMOs as the upper limit. The study considers the use of a 10% threshold appropriate for Bristol in the determination of proposals for new HMO development.</p> <p>ORS Report – Reviewing the demographic evidence for the City of Bristol to establish local housing need – November 2022¹⁰ - doesn't mention HMOs.</p>

¹⁰ <https://www.bristol.gov.uk/files/documents/5447-local-housing-need-paper/file>

LPA	Action Taken	Evidence
	<p><i>Exacerbating existing harmful conditions including those listed at (i) above; or</i></p> <p><i>Reducing the choice of homes in the area by changing the housing mix.</i></p> <p><i>Where development is permitted it must provide a good standard of accommodation by meeting relevant requirements and standards set out in other development plan policies.</i></p> <p>Managing the development of houses in multiple occupation SPD (adopted 03/11/2020) – this sets out HMOs in Bristol, when planning permission is required, how planning applications are assessed, determining harmful concentrations and good standards of accommodation etc.</p> <p>There are Article 4 Directions covering some areas of Bristol removing permitted development rights for C3 to C4 change of use.</p>	
<p>Northampton Borough Council</p>	<p>Additional licensing is in place in Northampton from 2020-2025 covering all HMOs within a selected area (previous scheme ended 2019).</p> <p>Article 4 Direction covering the entire Borough, removing permitted development rights from Use Class C3 to Use Class C4.</p> <p>Adopted (2023) Northampton Local Plan Part 2 - Policy HO3 Delivering Houses in Multiple Occupation</p> <p><i>All planning applications for change of use from dwellinghouses to a small house in multiple occupation (Class C4) or a large house in multiple occupation (sui generis) will be supported provided that less than 10% of the dwellings within a 50m radius of the application site are houses in multiple occupation. Schemes should be compliant to the</i></p>	<p>Report to Northampton Borough Council (from Loughborough University) – A Study of Housing in Multiple Occupation (HMO) Policy, November 2018¹¹. This report considers current Northampton policies on HMOs and makes recommendations. The study:</p> <p>Outlines the current demand and supply of HMOs in Northampton as well as geographic concentrations.</p> <p>Assesses the potential future growth of higher education facilities.</p> <p>Determines the impact of HMOs on local character. Observations from field visits in areas of high HMO concentrations include general poor maintenance, dilapidation of housing stock, unkempt gardens, loft conversions, fly-tipping, excessive waste, and high levels of parked cars.</p>

¹¹ <https://www.northampton.gov.uk/downloads/file/12106/02-a-study-of-housing-in-multiple-occupation-hmo-policy>

LPA	Action Taken	Evidence
	<p><i>Council’s existing space standards for houses in multiple occupation, and provide sufficient refuse storage which will be available within the curtilage of the site and within a secure facility. They should not result in an increase in flood risk and risks arising from surface water drainage. The applicant needs to demonstrate that the future occupants of any ground floor bedrooms are protected from flood risk. Appropriate provision should be made for car parking and cycle storage.</i></p>	<p>Makes policy recommendations including a blanket Article 4 Direction across Northampton, a saturation threshold of 10% within 50 metres of a planning application, information sharing between services in the local authority area, and pro-active enforcement of licensing.</p> <p>Cabinet Report (October 2019) – Proposed Designation of an Additional HMO Licensing Scheme¹². This report was made on the basis of consultation undertaken and a report outlining hazards identified during HMO inspections. The report outlines:</p> <p>In the 3 years previous to the report the Housing Enforcement Team inspected 141 mandatory HMO premises and 162 additional HMO premises. 30% of the former and 48% of the latter required interventions regarding concerns about fire safety and 41% and 30% respectively required intervention to improve inadequate facilities.</p> <p>As of 2nd May 2019 there were 844 licensed HMOs (457 mandatory and 387 additional).</p> <p>Refers to the Loughborough University Report outlined above.</p>

¹² <http://www.northamptonboroughcouncil.com/councillors/documents/s60248/Cabinet%20Report%20Designation%20of%20Additional%20HMO%20Licensing%20Scheme%2016%20Oct%202019.pdf>

