



Managing the development of houses in multiple occupation
Draft Supplementary Planning Document
Reg. 13 Version (August 2020)

Summary of Reg. 13 Representations

October 2020

Contents

1.	Summary of individual representations	4
2.	Changes made to document.....	22

1. Summary of individual representations

Rep. no.	Summary of comments by document section and other issues
01	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Highly supportive of the draft SPD. <p><u>Section 1.3: Houses in Multiple Occupation in Bristol</u></p> <ul style="list-style-type: none"> Welcomes the additions made to the list of harmful impacts. Could also include impacts on physical and mental wellbeing (as a result of noise and sleep deprivation - with a link to policy DM14) and retail impact. <p><u>Section 2.1: What is a House in Multiple Occupation? - Fig. 1</u></p> <ul style="list-style-type: none"> Useful to provide detail on Schedule 14 of the Housing Act 2004. Should provide detail on which student accommodation providers would own/manage buildings that are not classified as HMOs under Schedule 14 of the Housing Act 2004. <p><u>Section 2.2: Policy Context - Local</u></p> <ul style="list-style-type: none"> To ensure the additional guidance provided on harmful concentrations is in line with policy DM2 the following wording should be added to this section - 'In accordance with DM2, proposals for HMOs <i>will not</i> be permitted where the development would create or contribute to a harmful concentration of such uses within a locality.' <p><u>Section 2.3: Policy Context</u></p> <ul style="list-style-type: none"> Section 2.3 seems to suggest that only new HMOs will require planning permission within Article 4 areas and will therefore be subject to the guidance set out in the draft SPD. This is incorrect as it does not cover any retrospective planning requirement for conversion of dwellings to HMOs following the introduction of Article 4s where no planning permission has yet been sought. Such applications will also be subject to the SPD. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> The SPD should also set a threshold for HMO occupants at 20% of the population as identified by the HMO Lobby and referred to in the Council's evidence paper. This would provide a highly beneficial additional definition of a harmful concentration. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Welcomes the improved guidance on sandwiching but should be extended to include HMO development opposite residential properties. To cover sandwiching scenarios within unconventional street layouts or at street corners a street-level threshold assessment set at 20% within a 50 metre radius should be applied. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Should include a ward level threshold test set at 10%. Concerns that further HMO development in areas of wards with a lower concentration of HMOs will increase overall ward concentration which may already be high. The threshold calculation should accurately count all properties (dwellings and those classed as HMOs) including all residential sub-divisions. Need to ensure that multiple HMO licensed properties within buildings are all counted within the threshold calculation. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> A quantitative method of measuring a harmful concentration of purpose-built student accommodation would be appropriate and useful. As worded the impact of such development (e.g. transitory occupation, mass movements along key routes to/from bars/clubs resulting in noise and disturbance, impact on retail) may not be taken into account in planning decisions. The quantitative method is explained as follows: Where the threshold calculation indicates more than 7% HMOs within an area any purpose-built student accommodation within that area should also be taken into

	<p>account. This is done by converting the number of beds within such accommodation to a number of equivalent HMOs using an appropriate ratio that reflects the level of harm (considered to be less than HMOs). The ratio suggested is 12 bed spaces to 1 HMO. This calculation is added to the HMO threshold calculation to provide the overall HMO percentage.</p> <p><u>Section 4.5: Information on Datasets</u></p> <ul style="list-style-type: none"> • Further data should be used including pending licence applications and enforcement investigations as backlogs of such cases are high and data updates infrequent. • Concerns about underestimating the number of HMOs due to licensing/planning enforcement backlogs.
02	<p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in parts of Clifton. • HMO concentrations too high in parts of Clifton. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Should be extended to include HMO development opposite residential properties.
03	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Strongly supports the draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation should be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Approach should be extended to include HMO development opposite and to the rear of residential properties. • Applications for HMO development should not succeed if sandwiching situations arise. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • HMO licenses should not be granted unless planning permission has been obtained. <p><u>Section 4. Assessment of Planning Applications</u></p> <ul style="list-style-type: none"> • Planning permission should not be given to retrospective applications for HMO development. Landlords of such properties are unlikely to meet the ‘fit and proper’ test. • Larger licensed HMOs that have not sought planning permission should have occupancy numbers restricted to 6 persons. <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> • Improvements to Council enforcement of planning/licensing breaches required.
04	<p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • The 100m radius is too wide and does not address localised concentrations. This may result in further HMOs being permitted. The radius should be 20m or defined at a smaller level by postcode. • Proposals for new HMO development that exceed the 10% threshold should be automatically refused. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Draft SPD does not address existing HMO concentrations. Action is needed to redress imbalanced communities. Re-applications for HMOs should be considered against the draft SPD.
05	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Appreciate that previous comments have been taken into account. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> • The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Notes that purpose-built student accommodation isn’t included in the HMO threshold assessment. The impact of these developments must be considered.

	<p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • A further assessment above neighbourhood level (ward/LSOA) would be welcomed. <p><u>Section 4.5: Information on Datasets - HMOs</u></p> <ul style="list-style-type: none"> • Dataset could be improved by requiring all HMOs within article 4 areas to apply for a certificate of lawful use to ensure the HMO is permanently recorded.
06	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Approach to sandwiching should be extended to include HMO development opposite residential properties. • Applications for HMO development should not succeed if sandwiching situations arise. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • The SPD should also apply to the development of purpose-built student accommodation.
07	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes principle of draft SPD. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in areas surrounding the University of Bristol. • HMO concentrations too high in areas surrounding the University of Bristol. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite and to the rear of residential properties. <p><u>Section 4.5: Information on Datasets</u></p> <ul style="list-style-type: none"> • Concerns about underestimating the number of HMOs due to licensing/planning update backlogs. • Further data should be used including pending licence applications and enforcement investigations as backlogs of such cases are high and data updates infrequent. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • Granting of HMO licenses should be subject to gaining planning permission. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Draft SPD does not address existing harmful HMO concentrations. Guidance is needed on how situations should be managed and controlled. • The SPD should include guidance on acceptable locations for new purpose-built student accommodation.
08	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes draft SPD. Hopes that over time HMO concentration in the Clifton Down Community Association Area might be reduced. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Clifton Down area. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Endorses submission from the Clifton Down Community Association.
09	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes draft SPD. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in Kingsdown.
10	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes purpose, scope and guidance within draft SPD. Appreciate that previous comments have been

	<p>taken into account.</p> <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Clifton Down area. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> • Unclear whether the cumulative presence of both purpose-built student accommodation and HMOs will be considered when making planning decisions. <p><u>Section 4.5: Information on Datasets</u></p> <ul style="list-style-type: none"> • Would like assurance that decisions will be taken based on current actual numbers of HMO licences including retrospective licence applications.
11	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Fully support aims of draft SPD which is long overdue. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Redland area. • HMO concentrations too high in parts of Redland. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development to the rear of residential properties. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> • A condition seeking sound reduction measures should be attached to all planning permissions for HMO development. This is not addressed in the SPD. Sound reduction measures should include electric doorbells (to replace door knockers) and soft-close door closers on internal doors. These measures could be added to the West of England - Code of Good Management Practice and compliance with this code conditioned.
12	<p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Clifton area. <p><u>6.2 Property Management</u></p> <ul style="list-style-type: none"> • Tenants to be better managed by letting agents. Guidelines to be provided on community values and waste management.
13	<p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Redland area. • HMO concentrations too high in parts of Redland. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Supports the 10% threshold within a 100metre radius. • A wider assessment area should be applied to protect residential properties further afield that may be experiencing harmful impacts through existing local HMO concentrations. <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> • Improvements to Council enforcement of licensing breaches required.
14	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. • The draft SPD should apply to all applications relating to HMOs. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Welcomes the guidance on sandwiching but should be extended to include HMO development opposite residential properties.
15	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD - great addition to support the Local Plan.

	<p><u>Section 2.1: What is a House in Multiple Occupation? - Fig. 1</u></p> <ul style="list-style-type: none"> Fig.1 identifies buildings owned or managed by student accommodation providers as not being HMOs. Further legislative references that clarify these exemptions could be provided to avoid misunderstanding. <p><u>Section 2.3: Policy Context</u></p> <ul style="list-style-type: none"> Section 2.3 seems to suggest that only new HMOs require planning permission within Article 4 areas. This does not cover all situations where permission/authorisation is required such as retrospective planning applications and certificates of lawful use. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> The SPD should also set a threshold for HMO occupants at 20% of the population as identified by the HMO Lobby. This would provide a helpful additional definition of a harmful concentration. The SPD should include a ward level threshold assessment. Without this a ward level proportion could exceed 10%. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Sandwiching approach should be extended to include HMO development opposite and to the rear of residential properties. This could be achieved by a street-level threshold assessment set at 20% within a 50 metre radius. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> A quantitative method of measuring a harmful concentration of purpose-built student accommodation is needed. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> The SPD should also consider the impacts of short-term lets.
16	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Welcome draft SPD which provides valuable guidance. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. The impact of these developments must not be missed. <p><u>Section 3.2: What is a Good Standard of Accommodation – Outlook and Privacy</u></p> <ul style="list-style-type: none"> No reference made to HMO bedrooms needing proper windows rather than just daylight. Requirement should be set out in Appendix B. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Welcomes the improved guidance on sandwiching but should be extended to include HMO development opposite residential properties.
17	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Strongly supports draft SPD. HMO concentrations too high in parts of Cotham. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Purpose-built student accommodation must be included in the HMO threshold assessment. Applications for HMO development should not succeed if the proportion of HMOs exceeds 10%. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Welcomes the guidance on sandwiching but should be extended to include HMO development opposite residential properties. Applications for HMO development should not succeed if sandwiching situations arise.

18	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Strongly supports draft SPD. • HMO concentrations creating tensions in parts of Redland. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • No planning application should succeed if sandwiching occurs. • Sandwiching approach should be extended to include HMO development opposite residential properties.
19	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite residential properties. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Supports the submission from Chandos Road Residents Association.
20	<ul style="list-style-type: none"> • Comments not relevant to draft SPD.
21	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports approach - needs speedy implementation. • HMO concentrations too high in parts of Cotham. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in Cotham area. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite residential properties. Impacts are the same as other sandwiching situations. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • Enforcement against non-compliance of licence conditions should be undertaken. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Problems cannot be fully resolved if existing HMO concentrations are not addressed?
22	<p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • HMO concentrations high in parts of Cotham. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. Illogical to exclude due to impacts on amenity. Decision needs to be reconsidered. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite residential properties. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Supports the 10% threshold.
23	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Hoped that the SPD will start to control the amount of homes being converted to temporary accommodation which is happening across large swathes of Bristol and should help to drive up standards. • Useful changes plus extra detail have been added since the initial consultation. • Overall the SPD will deliver a tremendous improvement to the current situation.

	<p><u>Section 1.3: Houses in Multiple Occupation in Bristol</u></p> <ul style="list-style-type: none"> • Welcomes the additions made to the list of harmful impacts. Could also include impacts on mental wellbeing (as a result of noise and sleep deprivation) and distorting the local retail mix (where local shops and services change to predominantly cater for a transient population). <p><u>Section 3.2: What is a Good Standard of Accommodation?</u></p> <ul style="list-style-type: none"> • All content in this section welcomed. <p><u>Section 3.2: What is a Good Standard of Accommodation? - Cycle and Car Parking</u></p> <ul style="list-style-type: none"> • Further explanation required on how discretion on the issue of resident parking scheme permits is to be applied to permitted HMO development. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Welcomes the improved guidance. • Approach should be extended to include HMO development opposite residential properties. • To cover sandwiching scenarios within unconventional street layouts a street-level threshold assessment set at 20% within a 50 metre radius should be applied. <p><u>Section 4.1: Sandwiching Assessment (Street level) - Fig. 3</u></p> <ul style="list-style-type: none"> • The diagrams relating to situation 1, 3 and 5 are confusing and need clarification. <p><u>Section 4.2: HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Welcomes the 10% approach at 100m – this is validated by evidence collected from other cities set out in the evidence paper. • Should include a ward level threshold test set at 10%. Concerns that further HMO development in neighbourhoods with a lower concentration will be allowed alongside neighbourhoods with a higher concentration resulting in increased wider concentrations and cumulative harm over time. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level) - Fig. 4</u></p> <ul style="list-style-type: none"> • The star (proposed HMO development) and square (existing HMOs) symbols should be colour coded to match the legend in Fig. 3. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> • The approach needs to be clearer. • Purpose-built student accommodation can cause different levels of harm depending on whether the building is managed or un-managed. On this basis the assessment of harmful effects as part of the decision-making process for proposed HMOs should be as follows: Any existing purpose-built student accommodation within 200m should be considered but each one assessed specifically against the types of harm detailed in section 1.3 of the draft SPD. <p><u>Section 4.5: Information on Datasets - HMOs</u></p> <ul style="list-style-type: none"> • Welcome improvements sought to data over time. • Concerns over loss of data when HMO licences expire and limited planning data relating to HMOs. Data quality will degrade over time. <p><u>Section 5: Submission Requirements for Applicants</u></p> <ul style="list-style-type: none"> • Plans relating to external facilities such as a rear garden should also be submitted. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> • Welcome inclusion of this section. • Any sound reduction measures should also apply to conversions. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Context to SPD provided in introductory text to the representation.
24	<p><u>6.2 Property Management</u></p> <ul style="list-style-type: none"> • Greater responsibility needed from landlords and universities to ensure tenants understand and comply with waste management requirements. Landlords should be liable for additional costs incurred. • Landlords should be responsible for the maintenance of garden areas.
25	<p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. Their impact is

	<p>very similar to that of HMOs. The exclusion of this form of accommodation represents a step backwards.</p> <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. Suggesting flexibility in this matter removes the SPDs teeth and is contrary to its purpose of clarifying what a harmful concentration is. Will lead to inconsistent decision-making or the guidance being ignored. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> The impact of purpose-built student accommodation ‘must be considered’, not ‘should’ as their impact is very similar to HMOs. The wording within this section is too permissive and may result in purpose-built student accommodation not being accounted for in planning decisions. The impact of purpose-built student accommodation should be taken into account by converting the number of beds in such buildings to a number of equivalent HMOs, e.g. 5 beds = 1 HMO. This should be stated within the SPD. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> New section welcomed. However first sentence should read ‘Proposals for the development or intensification of HMOs are subject to building regulations requirements relating to sound reduction’ instead of ‘...may be subject...’ <p><u>Other Issues</u></p> <ul style="list-style-type: none"> The Evidence Paper identifies the National HMO Lobby’s view that ‘the criteria for a balanced community is given as: not less than 60% families, not more than 33% one person households and not more than 10% HMOs’ Whilst purpose-built student accommodation is not included the obvious match for this form of accommodation is HMOs. If the HMO Lobby’s 10% figure is used then it should include purpose-built student accommodation.
26	<ul style="list-style-type: none"> Requires further information on the progress and development of the West of England Combined Authority’s Spatial Development Strategy and the Bristol Local Plan Review in order to make a representation on the draft SPD.
27	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Broadly welcomes and supports draft SPD. Appreciate that previous comments have been taken into account. <p><u>Section 2.1: What is a House in Multiple Occupation</u></p> <ul style="list-style-type: none"> Welcomes the clear definition of what constitutes an HMO. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Welcomes the detailed guidance on sandwiching but should be extended to include HMO development opposite residential properties. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> Robust guidelines required on where purpose-built student accommodation can and cannot be sited. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> The separation of planning and licensing is acknowledged however, the Council should seek a retrospective planning application for a property that has obtained an HMO licence but has not sought planning permission.
28	<ul style="list-style-type: none"> No comments.
29	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Supports draft SPD. Draft SPD should also relate to purpose-built student accommodation. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> Harmful impacts of HMOs acknowledged in the Clifton Down area. Particular concerns relating to: <ul style="list-style-type: none"> Unsuitability of old terraced houses for conversion resulting in poor plan layouts - HMO living areas

	<p>adjacent to bedrooms in neighbouring property.</p> <ul style="list-style-type: none"> - More frequent movements to and from properties day and night relating to student HMOs. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • Unwilling enforcement against non-compliance of licence conditions. <p><u>Section 6.2: Property Management</u></p> <ul style="list-style-type: none"> • Tenants poorly managed by landlords/letting agents. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Draft SPD should also relate to purpose-built student accommodation. • Unwilling intervention by universities to address problems with student HMOs.
30	<p><u>Other Issues</u></p> <ul style="list-style-type: none"> • The targeting of smaller HMOs particularly in the Clifton/Cotham/Redland area is not supported. These are largely operated by reputable landlords and often let to professionals. Additional costs, as a result of licensing requirement, have to be passed on to tenants. Resources should be focused on non-compliant landlords in other areas of the city. • Concerns that community panic over HMO creation is unjustified. Negative perceptions of HMOs could unnecessarily de-value an area.
31	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. • HMO concentrations high in parts of Cotham. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite and to the rear of residential properties. <p><u>Section 4. Assessment of Planning Applications</u></p> <ul style="list-style-type: none"> • Planning permission should not be given to retrospective applications for HMO development. Landlords of such properties are unlikely to meet the 'fit and proper' test.
32	<ul style="list-style-type: none"> • Comments not relevant to draft SPD.
33	<p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Ashley Down Road area.
34	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes draft SPD. Will avoid further detriment to the environment and amenities of local communities. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Cotham area. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Welcomes 10% HMO threshold level. • Exclusion of purpose-built student accommodation from the HMO threshold assessment not supported. Impacts of such accommodation include noise, poor waste management and parking problems - excluding it will result in significant detrimental effect on local communities. <p><u>Section 3.2: What is a Good Standard of Accommodation – Cycle and Car Parking</u></p> <ul style="list-style-type: none"> • Parking permits should be limited for HMOs. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite and behind residential properties.

	<p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • All HMOs must be licensed. • HMO licenses should be subject to gaining planning permission. • All HMOs must be inspected to ensure compliance with minimum maintenance and safety standards. • Landlords should be required to annually update their contact details with neighbouring properties. • Landlords must demonstrate they have informed tenants of their responsibilities. • Licences should not be automatically renewed if evidence of persistent problems (from tenants or maintenance of the property). <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> • Improvements to Council enforcement of planning/licensing breaches required.
35	<ul style="list-style-type: none"> • Comments not relevant to draft SPD.
36	<ul style="list-style-type: none"> • Fully supports response from Action for Balanced Communities.
37	<ul style="list-style-type: none"> • Do not wish to comment.
38	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Draft SPD very much welcomed. Commend the creation and work conducted on this important guidance. <p><u>Section 2.1: What is a House in Multiple Occupation?</u></p> <ul style="list-style-type: none"> • The definition of a student accommodation provider needs to be included as this is referred to in Fig. 1. <p><u>Section 2.1: What is a House in Multiple Occupation? - Fig. 1</u></p> <ul style="list-style-type: none"> • Unclear why purpose-built student accommodation provided by a student accommodation provider is not considered an HMO. The impact of such properties on communities is significant so should be treated as an HMO or subject to the same restrictions. <p><u>Section 2.3: Policy Context</u></p> <ul style="list-style-type: none"> • Section 2.3 seems to suggest that only new HMOs will require planning permission within Article 4 areas and will therefore be subject to the guidance set out in the draft SPD. This is misleading as it does not cover any retrospective planning requirement for conversion of dwellings to HMOs following the introduction of Article 4s where no planning permission has yet been sought. Such applications will also be subject to the SPD. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> • The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • The SPD should also set a threshold for HMO occupants at 20% of the population as identified by the HMO Lobby. This would provide a further definition of a harmful concentration. <p><u>Section 3.2: What is a Good Standard of Accommodation - Cycle and Car Parking</u></p> <ul style="list-style-type: none"> • The Council website link to restrictions on parking permits is not an effective means to control HMO related parking. <p><u>Section 3.2: What is a Good Standard of Accommodation - Refuse and Recycling Storage</u></p> <ul style="list-style-type: none"> • Draft SPD guidance relating to refuse and recycling is insufficient as the existing guidance note referred to does not make specific reference to HMOs. Draft SPD should include a requirement for a waste management plan and compliance with that plan. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Welcomes the additional guidance on sandwiching but should be extended to include: <ul style="list-style-type: none"> - HMO development opposite and to the rear of residential properties. - A street-level threshold assessment within a 50 metre radius. <p><u>Section 4.2: HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • A ward level assessment should also be included to ensure harmful concentrations do not arise across the wider community.

	<p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> • Use of a metric to support decision-making is encouraged. • Introduction of student bed spaces within an area above 10% HMOs will lead to a harmful concentration of students. This issue requires special consideration within the SPD. • Draft wording far too open and permissive to provide clear direction giving rise to concern that purpose-built student accommodation could avoid requirements of the SPD. <p><u>Section 4.5: Information on Datasets</u></p> <ul style="list-style-type: none"> • The threshold assessment should also include data on short-term lets.
39	<p><u>Section 2.3: When is Planning Permission Required? - Article 4 Directions</u></p> <ul style="list-style-type: none"> • Following concerns raised relating to Article 4 Directions: <ul style="list-style-type: none"> - May restrict delivery of HMOs reducing housing supply; - HMOs provide valuable affordable accommodation for younger people (not just students) who would otherwise be unable to purchase or afford market rents; - Discriminatory to penalise young professionals, graduates and migrant workers by restricting supply of HMOs; - Problem HMOs could be better addressed by more effective policing of licensed properties - this should be the priority; - Responsible landlords more affected by Article 4s than those already breaching regulations. <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Draft SPD applauded. A more effective means to address problems associated with HMOs than Article 4 Directions or extended licensing. • Separating HMOs from residential property perpetuates idea that HMOs are disruptive and of poor quality. Guidance infers that HMOs are likely to generate more noise than a regular family dwelling. High-quality HMOs should be recognised and well-integrated into localities as a valuable contribution to the housing offer that contributes to a sustainable balanced community. <p><u>Section 3.1: What is a Harmful Concentration</u></p> <ul style="list-style-type: none"> • Unclear why additional bed spaces within HMOs are subject to the sandwich and threshold assessments as any impacts on the amenity and character of the area would not be material, in particular increased waste production, and the number of HMOs would not increase. Approach would withhold much needed accommodation provision. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Assessments of HMO proposals should be flexible and case specific taking account of the following scenarios: <ul style="list-style-type: none"> - Where HMO concentrations have become an established part of an areas character (over the 10% threshold); - Where HMOs already sandwich residential property; - The introduction of high quality HMO accommodation within an area - this should be prioritised. <p><u>Section 3.2: What is a Good Standard of Accommodation – Internal Living Space</u></p> <ul style="list-style-type: none"> • Issues relating to layout, design and minimum amenity space should be dealt with under licensing. <p><u>Section 3.2: What is a Good Standard of Accommodation - Refuse and Recycling Storage</u></p> <ul style="list-style-type: none"> • Supports approach to refuse and recycling storage. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Not clear as to why up to three adjacent dwellings between two HMOs is considered sandwiching rather than just one. Evidence needed for this.
40	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes draft SPD. Will enable better control and consideration of HMOs. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Cotham area. • HMO concentrations too high in parts of Cotham. <p><u>Section 3: Additional Guidance</u></p>

	<ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Welcomes inclusion of vertical sandwiching assessment. Sandwiching approach should be extended to include HMO development opposite and behind residential properties. <p><u>Section 4.5: Information on Datasets</u></p> <ul style="list-style-type: none"> Concerns about underestimating the number of HMOs due to licensing/planning update backlogs. Further data should be used including: enforcement investigations, pending licence applications, unimplemented HMO planning permissions and purpose-built student accommodation. <p><u>Appendix B: Guideline Minimum Room Size Standards for HMO Development</u></p> <ul style="list-style-type: none"> Minimum room size standards are below the nationally described space standard.
41	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Strongly supports draft SPD. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> Harmful impacts of HMOs acknowledged in the Cotham area. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. No justification for this change - should be included. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Sandwiching approach should be extended to include HMO development opposite residential properties.
42	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Welcomes draft SPD. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Purpose-built student accommodation should be included in the HMO threshold assessment. Impacts of such accommodation, including noise (movements of student along key routes, especially at night) and changes in the character of local services (shops and cafes), should be taken into account. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Sandwiching approach should be extended to cover both sides of the road. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> A ward level assessment should also be included. <p><u>Section 4.5: Information on Datasets - HMOs</u></p> <ul style="list-style-type: none"> HMO properties under planning enforcement investigation should be included in the sandwiching assessment. Data updates should be more regular.
43	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Agree with Council's approach. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> HMO concentrations too high in parts of Cotham. <p><u>Section 6.1: HMO Licenses</u></p>

	<ul style="list-style-type: none"> • Will HMO licenses be renewed on properties in areas of high HMO concentration given impacts felt? This should not be allowed. • Enforcement against non-compliance of licence conditions, in particular revocation of licences, should be undertaken. No evidence of this happening which undermines entire process.
44	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • An excellent document. Logical approach clearly and effectively articulated. <p><u>Section 4.1: Sandwiching Assessment (Street level) - Fig. 3</u></p> <ul style="list-style-type: none"> • Clarification required for situation 3 - Are the adjoining HMOs shown in situations 2 and 4? <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Is the Local Land and Property Gazetteer (LLPG) publicly accessible?
45	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Very welcome - valuable guidance and excellent work. <p><u>Section 3.2: What is a Good Standard of Accommodation - Outlook and Privacy</u></p> <ul style="list-style-type: none"> • No reference made to HMO bedrooms needing proper windows rather than just daylight. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment.
46	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Strongly supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment especially in areas where significant numbers of students exist. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite residential properties.
47	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Pleased by the draft SPD. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in High Kingsdown including noise and disturbance, poor waste management and reduced shopping and public transport provision. Combinations of these factors can affect the health and well-being of permanent residents. <p><u>Section 1.3: Houses in Multiple Occupation in Bristol</u></p> <ul style="list-style-type: none"> • Impacts on emotional well-being and mental health should be added to the list of harmful effects associated with high numbers of HMOs. <p><u>Section 2.3: When is Planning Permission Required - Article 4 Directions</u></p> <ul style="list-style-type: none"> • Understands that the requirement to submit a planning application within an article 4 area can be avoided. The SPD should help to close any loopholes. <p><u>Section 3. Additional Guidance</u></p> <ul style="list-style-type: none"> • Additional guidance relating to harmful concentration should take account of street width. Impacts on residential properties from HMOs on the opposite side of the street may be lesser or greater depending on the width of the street. <p><u>Section 6.1: HMO Licences</u></p> <ul style="list-style-type: none"> • Questions relating to the use and occupation of a property should form part of the licensing assessment.
48	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. An improvement on the previous version but further improvement needed. Overall the draft SPD will deliver a tremendous improvement to the current situation. <p><u>Section 1.3: Houses in Multiple Occupation in Bristol</u></p>

- Welcomes the additions made to the list of harmful impacts. Could also include impacts on mental wellbeing (as a result of noise and sleep deprivation) and distorting the local retail mix (where local shops and services change to predominantly cater for a transient population).

Section 2.2: Policy Context - Local

- To ensure the additional guidance provided on harmful concentrations is in line with policy DM2 wording should be added to this section which states that harmful concentrations as described in section 3.1 will not be consistent with Local Plan policy.

Section 3: Additional Guidance

- The wording of the additional guidance should be amended from ‘...unlikely to be consistent with Local Plan policy...’ to ‘...not consistent...’ to ensure alignment with policy DM2.

Section 3.2: What is a Good Standard of Accommodation?

- All content in this section welcomed.

Section 3.2: What is a Good Standard of Accommodation? - Cycle and Car Parking

- Further explanation required on how discretion on the issue of resident parking scheme permits is to be applied to permitted HMO development.

Section 4.1: Sandwiching Assessment (Street level)

- Welcomes the improved guidance on sandwiching but wording in first para. should be amended from ‘...unlikely to be consistent with Local Plan policy...’ to ‘...not consistent...’ to ensure alignment with policy DM2.
- Approach should be extended to include HMO development opposite residential properties.
- To cover sandwiching scenarios within unconventional street layouts a street-level threshold assessment set at 20% within a 50 metre radius should be applied.

Section 4.1: Sandwiching Assessment (Street level) - Fig. 3

- The diagrams relating to situations 1, 3 and 5 are confusing and need clarification.

Section 4.2: HMO Threshold Assessment (Neighbourhood level)

- Welcomes the 10% approach at 100m. This is validated by evidence collected from other cities set out in the evidence paper.
- Wording in first para. should be amended from ‘...unlikely to be consistent with Local Plan policy...’ to ‘...not consistent...’ to ensure alignment with policy DM2.
- Need to ensure that multiple HMO licensed properties within buildings are all counted within the threshold calculation.
- Should include a ward level threshold test set at 10%. Concerns that further HMO development in neighbourhoods with a lower concentration will be allowed alongside neighbourhoods with a higher concentration resulting in increased wider concentrations and cumulative harm over time.

Section 4.2 HMO Threshold Assessment (Neighbourhood level) - Fig. 4

- The star (proposed HMO development) and square (existing HMOs) symbols should be colour coded to match the legend in Fig. 3.
- Further clarification required to HMO Threshold Calculation.

Section 4.4: HMOs and Purpose-built Student Accommodation

- The approach needs to be clearer.
- Purpose-built student accommodation can cause different levels of harm depending on whether the building is managed or un-managed. On this basis 2 options are proposed for the assessment of harmful effects as part of the decision-making process for proposed HMOs.
 - Any existing Purpose-built student accommodation within 200m should be considered but each one assessed specifically against the types of harm detailed in section 1.3 of the draft SPD;
 - Convert the number of beds within the accommodation to a number of equivalent HMOs using an appropriate ratio suggested as 12 bed spaces to 1 HMO. This calculation can be used as extra information to inform the decision. The assessment could be undertaken at the 100m level and at ward level.

Section 4.5: Information on Datasets - HMOs

- Welcome improvements sought to data over time.
- Concerns over loss of data when HMO licences expire and limited planning data relating to HMOs. Data quality will degrade over time.

	<p><u>Section 5: Submission Requirements for Applicants</u></p> <ul style="list-style-type: none"> Plans relating to external facilities such as a rear garden should also be submitted. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> Welcome inclusion of this section. Any sound reduction measures should also apply to conversions.
49	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Supports draft SPD. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> HMO concentrations too high in parts of Redland. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Supports 10% threshold level. Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. This form of accommodation has similar impact to HMOs and excluding it from the count will harm residential neighbourhoods. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Sandwiching approach should be extended to include HMO development opposite residential properties.
50	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. Logic for exclusion unclear. Presents landlords with a loophole.
51	<p><u>Whole document</u></p> <ul style="list-style-type: none"> The spread of HMOs and purpose-built student accommodation should be limited in Redland and surrounding areas. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> Significant harmful impacts of HMOs acknowledged in Redland. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. This will undermine attempts to limit the spread of HMOs. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> Local landlords have not provided their contact details to residents or taken responsibility for tenant's behaviour in breach of licensing conditions. Un-licensed HMOs should be closed. <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> Neighbourhood Enforcement Team unresponsive to noise complaints. Improvements required to licensing enforcement.
52	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Most of the comments concerning the previous consultation have been adequately addressed. <p><u>Section 3.2: What is a Good Standard of Accommodation</u></p> <ul style="list-style-type: none"> Parking, waste management and privacy issues should be adequately addressed with processes set out. <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> Needs to be an easy way to raise concerns about the management of HMOs. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> The shift from family accommodation to short-term occupancy should be considered.

53	<p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> The 10% threshold level should be consistently applied. This was not applied in a recent application.
54	<p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> HMO concentrations too high in parts of Cotham. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> The 10% threshold level is supported and should be strictly and consistently applied. This approach was applied in a recent application.
55	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Welcomes the draft SPD. Will benefit communities likely to be subject to HMO growth. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. Proposals resulting in sandwiching or exceeding the HMO threshold should not be permitted. <p><u>Section 4: Assessment of Planning Applications</u></p> <ul style="list-style-type: none"> Large-scale purpose-built student accommodation has an impact on the balance of communities e.g. noise, retail offer. The proportion of students in an area needs to be considered when assessing applications for new HMO development. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Sandwiching approach should be extended to include HMO development opposite and to the rear of residential properties. <p><u>Section 4.5: Information on Datasets - HMOs</u></p> <ul style="list-style-type: none"> The process of counting HMOs is not accurate and needs to be better understood by organisations and individuals. <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> Opportunities to report unauthorised HMOs should be provided through public engagement. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> The impact of AirBnB whole properties should also be considered.
56	<p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> Harmful impacts of HMOs acknowledged in Redland, Cotham and Clifton areas. HMO concentrations too high in parts of Redland, Cotham and Clifton. <p><u>Section 6.2: Property Management</u></p> <ul style="list-style-type: none"> Local example provided of poorly managed HMO property.
57	<p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> Harmful impacts of HMOs acknowledged in the Redland area. Further HMOs in Redland area opposed. <p><u>6.2 Property Management</u></p> <ul style="list-style-type: none"> Poor landlord management of local HMO properties - complaints ignored, contact details not provided.
58	<p><u>Whole document</u></p> <ul style="list-style-type: none"> Strongly supports draft SPD. Changes made following the first round of consultation mostly positive but areas that could be improved. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described

	<p>within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. If the draft SPD seeks to provide flexibility then the scope and purpose of such discretion needs to be explained. Policy DM2 does not appear to refer to any such flexibility.</p> <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. This will damage the aim of the SPD which is to restrict the growth of shared housing due to acknowledged harmful impacts. This includes purpose-built student accommodation which has similar effects, in particular noise and disturbance created by busy movement corridors between bars/nightclubs and residential areas. • Should not be assumed that the development of purpose-built student accommodation will be confined to the city centre. Future student growth will create pressure for such accommodation in or near residential areas. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Welcomes the additional guidance on sandwiching but clarification required on the following issues: <ul style="list-style-type: none"> - That situation 1 set out in Fig. 3 could equally apply to detached or semi-detached properties. - How the assessment applies where two lines of properties meet at a street intersection. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level) - Fig. 4</u></p> <ul style="list-style-type: none"> • The legend should distinguish between dwellings selected within the radius and dwellings outside the radius. • Needs to make clear that buildings can have multiple licences all of which are counted to ensure consistency with the counting of all dwellings. • Not making available the Council's calculation software to the public raises issues of transparency and makes officer decisions based on this calculation difficult to challenge or verify. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> • Need for greater detail in this section to address the following issues: <ul style="list-style-type: none"> - If purpose-built student accommodation cannot be counted as equivalent HMOs some alternative method to evaluate objectively the combined effects of the two forms of accommodation must be found. - The section should acknowledge that an application might fail under the alternative method even if the proposed Neighbourhood assessment shows HMOs to be under the 10% threshold. - The phrase 'appropriate area level' needs to be better defined. - A separate SPD is needed to deal with proposals for purpose-built student accommodation. - Clarification required on what type of purpose-built student accommodation needs to be licensed. Such licensed accommodation must be included within the HMO threshold assessment and stated in the draft SPD. <p><u>Section 4.5: Information on Datasets - HMOs</u></p> <ul style="list-style-type: none"> • Concerned that not all HMOs are counted within the threshold calculation. In particular HMOs awaiting a licence renewal will not be identified. If the Council allows such HMOs to continue operation without a licence then they must be counted. • Properties operating as HMOs that are subject to licensing and/or planning enforcement investigations should also be counted within the threshold calculation. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> • Welcomes inclusion of this new section. However, specific noise mitigation measures beyond those mandated by regulations could be identified through best practice guidance and adopted by developers on a voluntary basis. Measures could include: <ul style="list-style-type: none"> - Use of soft-closers on internal doors and external doors; - Replacement of door knockers with doorbell/keyless systems; - Sound-deadening material on stair treads; - Location/design of bathroom sanitary ware to avoid noise transmission through party walls; - Plan layouts that avoid positioning of communal rooms opposite bedrooms in adjoining properties and restriction of access to elevated external areas (i.e. balconies, roofs). - Noise mitigation measures where access to properties is from the rear via external steps and walkways (i.e. HMOs above commercial premises). These can include enclosed lobbies and walkways or creation of an entrance on the main street.
59	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p>

	<ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • No planning application should succeed if sandwiching occurs. • Sandwiching approach should be extended to include HMO development opposite residential properties.
60	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Strongly supports draft SPD - will help to develop strong and sustainable communities. Council to be congratulated. <p><u>Section 3.1: What is a Harmful Concentration?</u></p> <ul style="list-style-type: none"> • Supports sandwiching and HMO threshold approaches.
61	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Council's work on improving the regulation and development of HMOs a positive step. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. • A flexible approach to the development of HMOs should not be taken where the 10% threshold has been reached. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • Stronger enforcement of licensing conditions required relating to anti-social behaviour.
62	<p><u>Whole document</u></p> <ul style="list-style-type: none"> • Strongly supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. No explanation for this change - should be included. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • No planning application should succeed if sandwiching occurs. • Sandwiching approach should be extended to include HMO development opposite residential properties. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • Compliance with license conditions should be checked. • Reviews of licenses should be undertaken where instances of non-compliance. • Consultation should be undertaken as part of the license renewal process.
63	<p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Significant harmful impacts of HMOs acknowledged in Cotham. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • No action to revoke licences taken where breaches occur. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Important that SPD is adopted.
64	<ul style="list-style-type: none"> • Has asked to be notified of the adoption of the draft SPD.
65	<p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. • Proposals for new HMO development that exceed the 10% threshold should be refused. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> • Much stronger requirements for noise attenuation needed. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Concerns that the introduction of new permitted development rights allowing additional storeys to dwellinghouses will allow for the intensification of HMOs. The potential for future implementation of this permitted development right should be considered when determining applications for new HMO

	development.
66	<ul style="list-style-type: none"> Demand for HMOs has been driven by student growth which has supported the viability of universities. Consideration should therefore be given to the economic impacts of restricting HMOs.

2. Changes made to document

Section	Key changes made
1.3 Houses in Multiple Occupation in Bristol	Further detail and clarification provided relating to harmful impacts of HMO concentrations on communities.
2.1 What is a House in Multiple Occupation Fig 1: When is a Property an HMO?	Further detail and clarification provided relating to buildings that are not defined as HMOs.
2.3 When is Planning Permission Required Article 4 Directions	Clarification provided on the need for a planning application for a change of use from a dwellinghouse to a small HMO within an Article 4 area.
3. Additional Guidance	Deletion of 'Additional guidance' from title of each shaded box.
3.2 What is a Good Standard of Accommodation Refuse and Recycling Storage	Further detail provided relating to guidance supporting Local Plan policy DM32.
4.1 Sandwiching Assessment (Street level)	Example of further sandwiching situation provided.
4.1 Sandwiching Assessment (Street level) Fig. 3 Sandwich Assessment - Worked Examples	Diagram legend relating to situation 1 expanded for clarification. Diagram of further sandwiching situation provided. Diagrams relating to situations 4 and 6 amended for clarification.
4.2 HMO Threshold Assessment (Neighbourhood level)	Clarification provided on use of Bristol City Council software for HMO threshold assessment.
4.2 HMO Threshold Assessment (Neighbourhood level) Fig. 4 HMO threshold Assessment - Worked Example	Diagram symbols and legend amended for clarification. Further detail provided relating to HMO threshold calculation for clarification.
4.4 HMOs and Purpose-built Student Accommodation	Further detail and clarification provided relating to the determination of applications for HMO development within local areas containing purpose-built student accommodation.
4.5 Information on Datasets - HMOs	Clarification provided on numerator description. Clarification provided relating to identification of HMOs. Further detail provided relating to future recording of HMOs.
6.3 Sound Reduction Measures	Further detail provided relating to voluntary installation of sound reduction measures.
6.4 Reporting a Breach of Planning or Licensing Rules	Further detail provided on reporting a breach of licensing rules.