

Draft SPD consultation responses in full

Appendix 1

Respondent name	Response
<p>Lower Oldfield Park Residents Association (Graham Feltham)</p>	<p>1. Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath. We agree with the general approach to manage the concentration of HMOs, reducing the criteria to 10% instead of the current 25%. However if BANeS should also consider the number of student bed spaces in any one area where there is Purpose Built Student Accommodation (PBSA) blocks which also significantly stifle the SPD's stated aim of achieving balanced communities. e.g. The application (now at appeal) for redevelopment of Wansdyke Business Centre in Oldfield Park where it has been controversially proposed to build a PBSA block in an area with an already high concentration of HMOs.</p> <p>2. Do you agree with the Sandwich Policy proposed in the draft SPD? Yes we agree with this proposal.</p> <p>3. Do you agree with lowering the HMO threshold to 10% from 25%? Yes we agree with this proposal. We would also advocate that if this proposal is adopted, and we understand that this is not retrospective, that in an area that will exceed the 10% rule, that any HMO that changes ownership should have to reapply for HMO permission, and that this would be considered in respect of any new rules restricting HMOs to 10%. The National Planning Policy Framework (NPPF) states that an objective for LPAs is to create balanced communities. We strongly believe this situation to have been caused by the lack of a formal Student Housing Policy which has resulted in the Universities providing accommodation for only a small minority of their students. The National HMO Lobby, in its publication 'Balanced Communities and Studentification – Problems and Solutions' (http://hmolobby.org.uk/39articles.pdf) defines (on p.7) a 'Tipping Point' as the threshold beyond which balanced communities become unbalanced, based on comprehensive research. The NHMOL defines the tipping point in a given location as the point at which either:</p> <ul style="list-style-type: none"> · the number of HMOs exceeds 10% of properties; or · the number of HMO occupants exceeds 20% of the population. <p>A community in which a quarter of properties are HMOs cannot be described as 'balanced' and agrees with NHMOL that a 10%</p>

	<p>threshold is more appropriate; indeed necessary, particularly for university towns/cities, like Bath, where students form a high proportion of the population. We consider that there is revised local evidence which supports the view that the student population in Bath has grown to 25% to be another reason why the HMO property threshold should be significantly reduced. The Universities have demonstrated during the BANES Placemaking Plan process that they have no intention of accommodating more than about a third of their full-time students in university-managed accommodation. With the vast majority of Bath’s students already dependent on the private rented sector for their accommodation, the demand for HMOs and Purpose Built Student Accommodation (PBSA) will therefore only continue to increase over the coming years. Potential ‘studentification’ (with its attendant imbalance of communities) of even wider areas of the city should therefore be more tightly controlled than hitherto by urgently reducing the HMO property threshold to 10%.</p> <p>4. Any other comments? We understand the need for HMOs but BANES must control the amount to which these are generally occupied by students with the nett result of over studentification of areas of Bath. The lowering of the threshold to 10% instead of the current 25% will go some way to provide more balanced communities. It will be very difficult to redress the harm that has already taken place in parts of Oldfield Park and Twerton, but a 20% of population limit which includes purpose built Student accommodation would be a step in the right direction. The two Universities in bath have enough space to provide more on site accommodation for their increasing number of students.</p>
Joe Scofield	<p>“Do you agree with the general approach of the SPD...?” Yes and no. I would like to see a real commitment towards doing whatever is necessary to pressure universities into housing many more students on campus. I realise this may involve lobbying government, but I would like to see an plan of action to make this happen, outlined somewhere in planning policy literature.</p> <p>“Do you agree with the sandwich policy...?” I think so. No residential house should be sandwiched between two HMO’s. As someone who formerly resided next to students at Newbridge Road, I would say that there is too great a risk of issues such as noise nuisance coming from both sides. I say this not out of any angst towards students, but out of realism. For example, a man living in a flat at The Parade, Twerton High Street, suffered from loud music coming from students - and it took nine months of pressure to get the problem sorted out.</p> <p>“Do you agree with lowering the HMO threshold to 10% from 25%?” Very much so. There’s far too much indifference to the erosion of community that an influx of HMO’s brings. Places like Twerton and Whiteway are disadvantaged areas but ones in which many residents draw support from friends, family and neighbours in the community. An unlimited influx of HMO’s could erode those supportive networks as long-term residents get replaced by short-stay tenants.</p>
William	I read about this proposal from the council weekly newsletter and subsequent email from the planning policy department. I am

Gaskell	<p>delighted that the council has decided to take this step forward in protecting vulnerable residents from the surge of buy to let landlords who are wrecking neighbourhoods and communities with their brash and cavalier attitude towards residents' well-being. This goes back to my speech at the meeting of the cabinet of the council on well-being in Bath on 12th May 2016.</p> <p>I would like to see more respect for senior residents in neighbourhoods, respecting education and qualifications rather than age or other pretensions, even for young people who are the senior resident, which is more in line with corporate culture around the world today. I would like to see the council making known details of 2 referees for tenants in HMOs to have enough protection from fraud and criminal activity such as nicking bikes and demands for money that is known to be common in Bath. This should be published on a database like the planning policy noticeboard on the council website, preferably with education and qualifications stated, so that people can be held to account and law suits for compensation can be more straightforward. I went to Eton College, the leading school in England, and got a physics degree from Bristol, but my neighbours continue to speak to me out of turn disrupting my career by speaking down to me, regardless that I am the senior resident, as if the place was a rave at some squat.</p> <p>I also think that the senior resident should be able to veto tenants in such HMOs, on health grounds. I also think that the senior resident should be paid a moving in fee, as the disruptions caused to neighbourhoods is significant. The fee can be waived for people of good character who move in to ready-furnished accommodation with just a few suit cases but the background check would be essential for security purposes.</p> <p>I propose a list of local public notaries, lawyers and accountants be made available to tenants landlords and subtenants by the council so that they may be able to gain references to facilitate short term lets and keep neighbours from each other's throats!</p>
David Stubbs	<p>I agree with the general approach of the SPD to manage the concentration of HMOs.</p> <p>I agree with the proposed Sandwich Policy.</p> <p>I agree in the lowering of the HMO threshold from 25% to 10%.</p>
Tony Chivers	<p>Again this problem raises it's ugly head, when will you planners see the light. We have enough HMO's especially in my area of Oldfield Park, as soon as a property is sold we all live in fear of who will buy and for what purpose, something I would like you planners to experience. If we have to choose, anything around 2% even that would be to much. Bring back families who take care of there homes and have pride in where they live, not just PROFIT.</p>
Chris noble	<p>I agree with the three questions on your consultation document, sent 01/09/2017, ie a,b and c</p>
Peter Mulvaney	<p>I have difficulty in accessing the policy via the contacts and website so cannot comment in detail. However suffice to say we have what must be in breach of curent policy existant on Junction rd adjacent to where we live and I do not support any new policy that makes it easier to create additional HMO's as the area is already under too much strain.</p>
Jim	<p>Do you agree with the general approach of the SPD to manage the concentration of HMOs in parts in Bath? Yes.</p>

Toogood	Do you agree with the Sandwich Policy proposed in the draft SPD? Yes. Do you agree with lowering the HMO threshold to 10% from 25%? Yes.
Tom Clifford	The Council should be mindful that the SPD does not create high concentration clusters of HMOs outside of the city. Almost regardless of location a high concentration of HMO will create the same problems for the 'host' community, therefore provision should be made for the SPD to apply elsewhere, as necessary.
A Heath	<p>I agree with the general approach in terms of scope, but have 5 concerns/queries on the approach:</p> <p>a) There appears no consideration of the size of residential to HMO conversion. Whether the HMO is a small 2 bedroom flat or a large Georgian property is a key fact in terms of impact, but is not included in the document. If a Georgian house is converted to flats and each is converted to an HMO, it could count as 4/5 HMOs, but if it is still a single dwelling, it will be one even though the effect will be the same.</p> <p>b) The reduction from 25% to 10% will spread HMOs around the city which may have undesirable side effects (see point c). I do not agree with the 25% to 10% reduction as I feel it is extreme in a city where around 25% of residents are students, but think an alternative which would take into account both points a) and b) would be to create a limit on number of permitted occupants within a certain area (e.g. 200 HMO occupants within 100m from the property), rather than the number of HMOs.</p> <p>c) There has been no consideration of transport impacts even though these are clear in the Arup report on your website. HMOs tend to increase occupant density, and public transport is most efficient in areas of highest density. As noted by the UN, the "UK National Travel Survey suggests that people living in higher density locations travel less far, as trip lengths are shorter, and they are likely to make more use of public transport." (https://unhabitat.org/wp-content/uploads/2013/06/GRHS.2013.Case_.Study_.London.UK_.pdf) There are a few key routes which are well served by public transport in Bath, and these are the areas with highest HMO presence (or key transport corridors). Without investment in public transport, spreading HMOs will force HMO residents to use private transport which will have undesirable side effects.</p> <p>d) The sandwich policy is a good idea, but needs to be extended to flats. Ideally residents should not be sandwiched between 2 floors of HMOs, or between HMOs on each side of their flat. How flats are dealt with needs to be clearly articulated.</p> <p>e) The key point is that this is an attempt to control the number of HMOs by restricting them, rather than the other option of reducing the demand for HMOs. Actively encouraging (and permitting) the RUH, University of Bath and Bath Spa University to cater for their</p>

	employees/students on their own land would reduce demand. Part of the University of Bath's Sulis Club could be converted to a student village (as done at numerous universities, e.g. Sheffield) but this would require agreement of the university and rezoning of the land. Likewise additional accommodation could be installed at the RUH. If private developers are constructing shared accommodation, it must be profitable.
Helen Dudden	Good morning, of course there are already problems with housing. Just too many demands on an area, not large enough to sustain an increased demand. I feel 10% is still too much. The increased housing rental costs to those who need housing, has probably made landlords review their ideas. This is an easy way to guarantee an income. You can't blame the landlord. I suggest a positive plan for the future. We need social housing, the cost of buying is simply above what most can afford. Affordable social housing. Newton St. Loe is still a good option, there may well be fewer options as the muddle on Foxhill, and the student housing continues. Of course, causing more issues with Homesearch, and those wanting a home on the list already.
Victor Windt.	Thank you for the opportunity to comment on the draft revised HMO SPD. Please note the following: I agree with the general approach of the draft revised HMO SPD to manage the concentration of HMOs in parts in Bath; I agree with the Sandwich Policy proposed in the draft revised HMO SPD; I agree with lowering the HMO threshold to 10% from 25%.
Neil Garrett	I agree with all three of the options detailed in your email.
Tadeo Corradi	Q: Do you agree with the general approach of the SPD to manage the concentration of HMOs in parts in Bath? A: Yes, more evenly distributed HMOs are better for all. Q: Do you agree with the Sandwich Policy proposed in the draft SPD? A: Yes Q: Do you agree with lowering the HMO threshold to 10% from 25%? A: Yes.
Richard Luetchford	I am confused. I have received your email of 1 September which requests comments on a "revised" SDP but the only one I can find through the various links you provide is the one last updated in April 2017. Is this still the one to be commented upon, taking into account the various ARUP report and review documents and the questions you pose in your email? Or is there a revised SDP I haven't found yet? Please help!
Catherine Smith	Thank you for your email. I agree with approach of the SPD to manage the concentration of HMOs in parts of Bath I haven't read the Sandwich Policy so I am unable to comment. I completely agree with the lowering of the HMO threshold to 10% Oldfield Park has been ruined by HMO's this should be implemented as soon as possible. Really we do not need any more student or HMO dwellings
Brian & Pat Langley	I agree it is about time something was done to restrict HMO's in all areas. The 10% is a good idea – it's a shame some of us have to put up with 40 – 50% already. I also think HMO's should be paying Council Tax - as most local HMO's use more than their fair share of the facilities. I would also like to see a stop on any more large buildings for students only, I think Oldfield Park and Twerton are saturated

	already. Just a suggestion – but is there any chance that some street cleaning could Be done in some of the most built up HMO areas.
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Mrs Jacqueline Burrows`	<u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u> I agree strongly that HMOs need to be very carefully managed across the city so as to avoid the creeping loss of good and affordable family
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	<p>homes with the consequent blight that HMOs often bring (more vehicles, additional parking, more rubbish per household, lack of long-term engagement by HMO residents in and with the local community, a hollowing-out of local communities, lack of care for local environment by short-term residents etc) and the inflation in house prices that occurs as a result of owners seeking to maximise revenue in the cheapest possible ways.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes, as far as it goes, but I believe it could be strengthened so that there is a requirement for more than one non-HMO property between HMOs and a clear policy on number of vehicles per property.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes. Strongly agree.</p> <p><u>Question 4 Any further comments?</u></p> <p>Friends and neighbours often feel constrained from objecting publicly when a neighbour applies to change their home to an HMO. It is important that the Council provides a robust and satisfactory policy as a result.</p>
Mr Patrick Quinlan	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>This is open to abuse as illustrated by the applicant at 4 Shaftesbury (17/00877/CLEU) whereby their assessment of %'s was incorrect and was not challenged by the LPA.</p> <p><u>Question 4 Any further comments?</u></p>

	<p>There should be a blanket ban on new HMO applications within and 100 metres from the the current HMO stage 1 test boundary. Other Bath central wards (i.e not Twerton / Oldfield Park / Westmoreland) should absorb this housing mix, enabling an inclusive Bath as opposed to separate silo enclaves / silos to London that have developed the last 20 years. The UoB have the equivalent of 10 football pitches used for single storey car parking - Not the most sustainable and efficient use of land!</p>
Mr Colin Vickery	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>It seems to me that young people are being discriminated against once again. Non students do not have the choice of purpose built student accommodation and very often have no other choice of housing than a hmo. I believe that it is unfair to severely limit the supply of suitable accommodation for them (and thereby raise costs and limit convenience). I have no problem with ensuring that all accommodation meets appropriate standards and that they are managed in a proper manner.</p>
Ms Dawn Skarset	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Minded to agree. The draft documents are rather vague and have a number of caveats about why the council may not be able to determine whether an existing property is an HMO, which makes me feel that if the council wanted to approve an application that is in conflict with the new policy proposals, it has a lot of wiggle room to approve anyway.</p>

	<p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes, definitely! No one who owns a single residence should have to suffer from being boxed in by HMOs. Plus it makes the street view look trashy to have a smaller residence squeezed between huge complexes.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes, definitely. In the last couple of years the Green Park Station area / Riverside development has seen a massive increase in HMOs. There now appears to be more flats available than renters in this area!</p> <p><u>Question 4 Any further comments?</u></p> <p>Feeling worried about current new development in Bath - Riverside is really unattractive and detracts from the beauty of the river. The new Apex & "student" housing developments around Green Park look like updated versions of the ugly 1960's buildings they are replacing. Not really enhancing the overall look of Bath. New development is great - as long as it fits in nicely with existing structures. What is going on right now looks cheap and rather unattractive.</p>
Dr Daniel Wolverson	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes, though too late for many</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>

	<p>HMO controls need to be balanced by a supportive approach to planning permission for student residences (which seems to be the case at the moment) because the universities in Bath are key industries in the city - I work at one - and I have no problem at all with Bath having a large student population if housed in the right way.</p>
<p>Mr Simon Scott</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>if you review Oldfield Park down to 10% I agree with it kept at 25% then that is not going help.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>yes</p> <p><u>Question 4 Any further comments?</u></p> <p>Please understand the impact that you are having on a community that should be the area where new young families should first move to when they come to Bath</p>
<p>Mr Norman Owen</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p>

	<p><u>Question 4 Any further comments?</u></p>
Mr Norman Owen	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
Mr John Lakey	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes definatly</p>

	<p><u>Question 4 Any further comments?</u></p> <p>It needs to be recognised that the availability of good public transport does not dissuade. Students from bringing cars, which are parked up, sometimes for days, all along our residential streets. We are currently overwhelmed with these vehicles during term times.</p>
Raj Manek	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>no</p> <p><u>Question 4 Any further comments?</u></p> <p>Due to the short term nature of their tenancies these residents have very little/no desire in contributing to their neighbourhood e.g. cleaning and keeping tidy front gardens, picking up after bin collections, keeping noise to a sensible level, not fly-parking their cars for weeks/months on end so that no one else can park etc.</p> <p>This behaviour is not limited to just students but also young professionals - we know this because we have x3 student houses in 1 direction and a flat conversion (Moravian Church) in the other direction. In reality the private lets in the Moravian Church are sometimes worse than the students!</p> <p>Also parking will get even more difficult than it already is. each HMO tends to bring with it a minimum of x2 cars.</p> <p>More HMOs will mean a further erosion of the local community feel that I would expect BANES would be keen to promote.</p>
Mr Dennis Gealy	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p>

	<p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
MR Peter Clinick	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Definitely Yes.</p> <p><u>Question 4 Any further comments?</u></p> <p>In the case of the road I live in,this is 'shutting the gate after the horse has bolted' With nearly 50% HMOs, taking this in to consideration the % in other adjoining streets should be a lot lower,then taking in all of the Oldfield Park saturation area,should mean that in other areas of the city there should be a lot less HMOs allowed (that should keep BA1 happy) if the % across the city is 10% surely that has nearly been reached.</p>

<p>Mrs Veronica Squires</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes, it seems fairly obvious that encouraging the development of necessary HMOs out of the ghetto areas can only benefit the entire community.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes. In order not to run the risk of continuous terraces of HMOs, maybe the policy should be extended to limit the number of HMOs next to each other to, say, 2.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes. At present allowing 1 in 4 houses to become HMOs is devastating communities.</p> <p><u>Question 4 Any further comments?</u></p> <p>1. What will be the policy where an HMO is granted for 3 occupiers & the landlord then applies for an extension to 4? At present it seems this is always allowed. How will this be considered within the 10% ruling? 2. Where an area has more than 10% HMOs at present, if an HMO comes on the market to be sold, will the permission be carried on to the new owner, thus keeping the enhanced level of HMOs, or will he have to reapply?</p>
<p>Mr James Harwood</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes totally agree</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>The sooner the threshold is lowered the better, Oldfield park is being destroyed by the amount of h.m.o.s the council needs to keep to there thresholds as lymore gardens has more than twenty five percent hmo occupancy, I would prefer to see the end of family houses being turned into h.m.o.s, if you continue with buildings in bath being turned into h.m.o.s you will eventually destroy the heritage of this city.</p>
<p>James and Saffia Love and Ahmad-Love</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>In principal, yes, we agree. We consider that we own a home, as a family residence, in a road that has over the years become more populated by HMO. We have noticed a significant change to the 'atmosphere' of the road in the last 5 or so years (particularly since the student accommodation on Lower Bristol Road, directly opposite the entrance to Vernon Park was built) since owner occupancy has decreased and more properties have become HMO. The community feel on the road has reduced and an increase in the amount of cars parked on the road as well as rubbish left on the pavements/ roads has increased. The HMO properties on our road seem to occupied by more adults with a car than you would normally expect from a property owned by a family. Most houses on the road originally were built with 2 or 3 bedrooms, the properties developed as HMOs often have more than 3 bedrooms.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes, as stated above. A limit on the amount of HMOs in our road has been helpful. Each time a family or owner occupied persons sell their home we are concerned it might of been purchased with the intent to develop the property into a HMO. We believe that</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes, absolutely for all the reasons provided in answer to questions 1 and 2 above. The number of HMO properties on our road has, in our view, a negative impact on living as a family in our home.</p>

	<p><u>Question 4 Any further comments?</u></p>
Linda Cook	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>As a householder whose property is already 'sandwiched', I wish this had been in place years ago.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
Mr Ph.ilip Hippiisley	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p>

	<p><u>Question 4 Any further comments?</u></p> <p>There definitely needs to be tighter control of houses used for HMO. I feel it is important to retain houses for families. If numbers are not controlled the universities will just increase there intake.</p>
Mr Paul Evans	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes, but it should be all of Bath.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes. But what about those areas with more than 25% ie Stanley Road West!</p> <p><u>Question 4 Any further comments?</u></p> <p>When can we expect the Council to start charging HMOs council tax and the Landlords business tax.</p>
Mr Paul Brett	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p>

	<p><u>Question 4 Any further comments?</u></p> <p>Nos 17 and 15 Stothert Avenue appear to have become HMOs, as the owner has been running them as AirBnBs. This is forbidden by the restricted covenants attached to the sale of the property by Crest Nicholson. This is causing distress to a neighbour. Legal notices have, we have been told, been served on the owner, but they seem to have been ignored. This should be checked.</p>
MS Josephine Strong	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>If it means other areas of Bath taking students, rather than predominantly Oldfield PArk then yes. I moved in 2002 and over the years have lost neighbour after neighbour to over populated student houses. The community is lost completely and in my opinion, the HMO ruling has made absolutely no difference to me.... it's too late, most houses in my street are student properties , the landlords of these properties provide NOTHING for the community which they have smashed to pieces. They don't even pay council tax. Bath has lost its appeal and community spirit due to the councils neglect and the universities greed.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Don't know</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>YES YES YES YES, let's have families back in Bath, let's have our community back</p> <p><u>Question 4 Any further comments?</u></p> <p>Car parking also a MASSIVE issue. Why are the uniivrsities allowing students to bring cars when they have amazing public transport, a dam sight better than the general public</p>
Mrs J Godwin	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p>

	<p>Yes and not before time. I should like to know why there is such a large concentration in the Oldfield park area and yet there appear to be few in, for example Larkhall. is this a deliberate move?</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Don'tknow what that is</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>YES YES and YES. 25% is far too much and destroys the community. Build more student accommodation at the University and build some more social housing for the local community instead.</p> <p><u>Question 4 Any further comments?</u></p> <p>20-25% of Bath population is students. This is much too high a percentage for a small city. Bristol, Oxford and Cambridge all have much less.</p>
Ms Joanna Grant	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes, I agree with any policy that wants to reduce HMOs in my area</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>I am currently sandwiched between two student houses, with 6 bedded HMOs opposite and next door but one. I wish this had not been allowed to happen. Apart from the behaviour of some of the students, the sheer number of people squashed into this small terr</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>I would love some of the houses on my street to become family homes again. The non student houses are elderly people and young families. It is a disturbance to have the amount of HMOs on the street that there are currently.</p>

	<p><u>Question 4 Any further comments?</u></p> <p>Oldfield park is a lovely area. My husband and I are nurses and the reason we could afford a house here is because the street is devalued by the number of HMOs. It feels as though people are living on top of each other, noise is a real problem for us, being parents of a toddler and working shifts. A reduction in HMOs would significantly improve the area and my quality of life.</p>
Miss Anna Kelk	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No I do not! HMOs positively contribute to the local economy</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No! If a local does not want to live next to students they should move out of a city centre. You shouldn't be able to your neighbours.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No I don't agree! As a student, I really struggled finding housing for this academic year and reducing the amount for future years would seriously impact this issue further</p> <p><u>Question 4 Any further comments?</u></p>
Mrs Esther Gardiner	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes absolutely the growth of the student population in Oldfield park has become too big for the area and there is now an imbalance between families and students. It is difficult for these two types of houses to live in harmony in regards to late night noise, parking and upkeep of the area.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>Yes I think this is very important especially if the family in the middle house are unlucky enough to have 2 noisy houses either side.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes but I don't know how this can be enforced. Do landlords need to reapply regularly for an hmo liscence? If not this will not solve the problem as already much higher than this. If it doesn't include the 3 large student blocks of flats on the lower Bris</p> <p><u>Question 4 Any further comments?</u></p> <p>While I think students bring a lot to Bath I think the universities and council have treated residents poorly by not protecting family housing stock for local residents and ensuring there is a proportionate mix of students and families across the city.</p>
Mr Stephen Chamberlain	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>I feel this may be a little draconian. How about 15%?</p> <p><u>Question 4 Any further comments?</u></p> <p>I was surprised at the student population statistics in the original document, and would have been very interested in any update on that. Only 18% of students not in halls?</p>
mr andrew	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree</u></p>

richman	<p><u>with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
Mr Jonathan Blain	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes, although the existing rule could be better applied.</p> <p><u>Question 4 Any further comments?</u></p> <p>The universities should he forced to build more accommodation on their campuses, for first, second and third year students. There is masses of space at each campus that should be utilised over Bath's housing stock. Planning needs to try and make builders of independent student blocks charge acceptable prices to students, rather than the profiteering</p>

<p>Mr Ashley Stoneman</p>	<p>that currently happens.</p> <p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No. I understand this may be to avoid gentrification, but would it not be more smart to keep family housing together to create a stronger community and allow areas to have more HMOs to create hubs of similar people?</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p>
<p>Mr Timothy Oluwole</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Not really.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>I don't understand the policy that well or what it is supposed to achieve.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No. It puts a massive, unnecessary strain especially on students. Seeking housing historically has already been a process that takes many months, which is a long time for a student to be preoccupied with anything outside of university.</p>

	<p><u>Question 4 Any further comments?</u></p> <p>N/A</p>
<p>Mr Barnaby Lamper</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No. It is an attack on students and young renters in bath disguised in poorly constructed bureaucracy.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No. It is again directed at preventing new student housing from being built in a city that needs more of it at affordable prices. This is not a problem that can be solved by trying to block students out.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No. This is the direct attack on students and young renters with contrived reasons for it that have no benefit to the city in general other than to make it less attractive to students. The city has two universities, lowering the HMO threshold is not going</p> <p><u>Question 4 Any further comments?</u></p>
<p>Mr David Leach</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>The 25% rule appears to be a decent way to control the density of HMOs</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Doesn't seem unreasonable.</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No. This simply widens the net too far. As both universities grow, there is already a huge shortage of affordable housing which forces students to sign contracts for poor quality housing at high prices, meaning private landlords and letting agents alike a</p> <p><u>Question 4 Any further comments?</u></p> <p>Stop painting students with the same brush. Yes, there are some morons that can't put their bins out correctly, and that host parties into the early hours. But most of us are capable human beings with concern for our neighbors. Encourage interaction between "residents" and "students" (though really we're all residents, because we live here too!!) Maybe if the morons knew the names of their neighbours, and had struck up a handful of friendly conversations, they may have more concern for them and their fellow residents.</p> <p>Also do something about awful quality housing and useless, deceitful letting agents. There are some really bad eggs out there (Roman City, Trustease)</p>
Dr Hazel Corradi	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>yes</p> <p><u>Question 4 Any further comments?</u></p> <p>Can anything be done to revert HMOs when they are sold on?</p>
Mr William	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree</u></p>

<p>Hopes</p>	<p><u>with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Although currently living in Gloucestershire, I will soon start a 5 year course at the University of Bath where there is already great competition for student housing. Going through with this would make it much harder for me and every other student at Bath and Bath Spa to find suitable accomodation in the 2nd year and beyond. I do not agree with this.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No this will limit the student housing available</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No this will limit the student housing available</p> <p><u>Question 4 Any further comments?</u></p>
<p>Miss Madeleine Barley</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>This year the University of Bath was placed 5th in Great Britain in the Guardian Higher Education League Table. In other league tables it has been placed 10th & 11th. It is clearly a prestigious higher education institution. The councils small minded attitude to student housing threatens the university enormously, especially given that already students face a huge struggle to find affordable and acceptable housing. These revisions to the councils legislature would make it even more difficult for students to simply find places to live. It is totally unacceptable. The council should accept that the students of the University of Bath deserve to live and work in the beautiful city of Bath just as much as anyone. They contribute to the community and the city as a whole and the way they are being vilified by the council is frankly disgusting. A little bit of open mindedness would go a long way. In short, stop trying to endanger the students and the university itself!</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No. There is already a massive struggle to obtain student housing. What exactly do you propose that students who are unable to find anywhere to live do? Where are they supposed to live during their studies? You are seriously endangering the functioning of</p> <p><u>Question 4 Any further comments?</u></p>
Miss Emily Craddock	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>N/a</p>
Mr Joseph Scourfield	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No.</p> <p>It is clear that HMO concentration is largely driven by growth in Bath's student population. This growth is a result of the University of Bath's</p>

	<p>continual increase in student intake despite the shortage in available housing and other necessary facilities.</p> <p>The University will not be materially affected by this change, and so will not change its policy. Likewise, prospective students have more important considerations than 2nd or 3rd year housing when choosing a university, and so are unlikely to be dissuaded from coming to Bath by this change. As a result, the student population will continue to rise, and be forced into a distorted housing market with supply monopolised by those landlords who already own HMO property in popular student areas (close to the universities and to facilities etc).</p> <p>This will force rents to rise to the point of unaffordability, and students spend less money supporting local businesses as they struggle to make ends meet.</p> <p>Overall, this policy will only serve to benefit local landlords, and students themselves will suffer as a result.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>The sandwich policy appears to be an attempt to address concerns over relations between students in Bath and older residents, particularly where they live in close proximity. This is understandable. However, the sandwich policy will only affect areas in w</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>As described in my response to question 1, lowering the supply of housing which is affordable to students will be damaging to all parties except landlords, who already benefit unfairly from the housing situation in the city. The council might do better t</p> <p><u>Question 4 Any further comments?</u></p> <p>I am a student at the University of Bath currently away on a placement year, hence my current addresses is outside of Bath. I recognise that there is a housing issue in Bath, but these policies will have a damaging effect and only serve to further increase the social issues between students and others residents in the city. I hope that the council will reconsider these changes.</p>
Miss Megan Bourne	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree</u></p>

	<p><u>with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>I'm about to start my first year at Bath university and I'm already worrying about if I will find somewhere to live in second and third year. I should be worrying about other things or getting excited. Instead I'm concerned that I will be stuck for accommodation in future years. Bath student accommodation is already lacking and now you want to get rid of it more. Its making me already regret coming to Bath and I haven't even got there yet. Students shouldn't be dissed just due to our age. We work hard, contribute to the community, have jobs all whilst studying full time. Why punish us by removing/reducing the amount of housing available. Bath is renowned for being a great student city but if things like this continue Baths reputation will be ruined and tarnished as a city that doesn't care about the hard working students and one that wants nothing to do with them for no good reason. Students have as much a right to a house as anyone else. Whilst I'm a student at Bath, I AM a Bath resident. Don't marginalise students by reducing the HMO threshold. Life is tough enough for students nowadays, don't add to it.</p>
ms pat beswick	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>yes although this is now rather too late for Oldfield Park !!</p> <p><u>Question 4 Any further comments?</u></p>
Mr Matthew Spaul	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes. As a student at the University, I think it is important to contain the reckless and unsustainable expansion the University has undertaken, pushing all pressure onto local housing instead of providing their own accommodation or residential services.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No. I don't think this provides any tangible benefit. The issue is the risk of creating a monoculture in certain regions, rather than that HMO residents are inherently bad neighbours.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes, so long as this only affects new properties. Currently the vast majority of students live in two relatively cheaper areas of Bath, so bus services are catering only to those areas and puts pressure on students to get houses near their friends'. This</p> <p><u>Question 4 Any further comments?</u></p> <p>It should be made more clear that this isn't intended just to demonise students but to pressure the university into being more sustainable in their expansion. While this likely will be unpopular with students (as the students union has urged to write responses to this in a particularly biased way), it's a necessary step to better integrate students into the local area and to prevent the university from accepting new students</p>

	without considering where they are to live.
Mr Shreyas Bhagwat	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>The lack of affordable housing in Bath is already an issue for students not living in halls. The proposed change only exacerbates this problem and will drive students away from Bath; the nightlife of Bath cannot handle such a loss.</p>
Mr Oliver Holt	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No, this policy does nothing to help the housing shortage in Bath. It will only increase rent prices as demand outstrips supply and unscrupulous letting agencies and landlords profit from those who can least afford it.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No, I think it should be handled on a case by case basis and not set out in policy.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p>

	<p>No, It should either stay at 25% or the council should review their whole approach towards HMOs.</p> <p><u>Question 4 Any further comments?</u></p> <p>The council should be trying to address the house shortage in Bath in a constructive manner, rather than disproportionately targeting certain groups of people.</p>
Miss Malika Ranshaw	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p>
	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Cannot read the draft SPD on my computer</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>yes</p> <p><u>Question 4 Any further comments?</u></p>
Mr Matthew Stedman	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>I do not.</p> <p>I believe that in order for the city to grow and prosper, and in the interest of advertising both of Bath's Universities, incentivising start-up businesses, and illustrating the council's commitment and support for higher education and research; affordable, communal accommodation is necessary, as it is in all densely populated cities, especially in those containing historic landmarks and multiple Universities.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>I do not.</p> <p>This makes the least sense of all of the new policies.</p> <p>Much of the disdain for HMOs comes from those living alone/families beside/near HMOs. Now you're proposing that only people living alone/families can choose to reside between two HMOs? Sure!</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Again, I do not.</p> <p>For the sake of even distribution and census results I can understand this point, though I still do not agree with it. I'm sure I am missing a bigger picture, but I truly don't see the negative of localising like-communities in regions of</p>

	<p><u>Question 4 Any further comments?</u></p> <p>The council have made it adamantly clear in recent years that they have every interest in allowing housing prices to rise, forcing students to either live outside of the city (meaning they will have to travel in, I wonder who's going to be paying for the increased parking or public transport routes?) or simply not attend the Universities.</p> <p>Start up businesses are currently sprouting around Bath, which is great to see, but how much do you think young, entrepreneurial individuals can afford to pay for private accommodation before they too will require HMOs?</p> <p>Various companies are building localised apartment blocks designated for students. Whilst I have no aversion to this concept, the pricing of these apartments normally matches or exceeds what students could afford in an HMO. By allowing this to happen (nay, promoting this), the council is condemning students, low-wage workers, and young professionals to pay the same price for a low quality of living.</p> <p>Final rant:</p> <p>I like to imagine that the majority of the board proposing these changes are over 40 years old, have a steady (even high, perhaps) income, and live in a lovely house. Don't ruin our future for us like with Brexit and the General Election. Don't condemn Bath when you've worked so hard to build it up. And don't advertise the councils general disregard for the support of higher education and entrepreneurialism.</p>
Miss Emily Taylor	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Currently, for a property owner to convert their property into an HMO, their application must pass two stages.</p> <p>The development of a property into an HMO will not be permitted where:</p> <ul style="list-style-type: none"> - The application property is within or less than 50 metres from a Census Output Area in which HMO properties represent more than 25% of households. - HMO properties represent more than 25% of households within a 100-metre radius of the application property. <p>This is fine currently. Really if you want to limit the amounts of HMO then you should try reduce the general house price in bath and stop selling to landlords who convert 4 bedroom houses in 10 bedroom squats.</p>

	<p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No. This proposal suggests people that cannot afford to buy their own house are lesser people who are not suitable neighbours? This is not only aimed at students but also hard working single professionals who need to house share as the house price in bath</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No. This is a ridiculous idea. What is wrong with people who live in HMO? This just further attacks them for not being able to buy their own house, it punishes young professionals and students who contribute to the Bath economy. As said above. The decrea</p> <p><u>Question 4 Any further comments?</u></p> <p>I am not sure why you think this is even a remotely good idea. It just benefits the rich and alienates the poor. A person living in a HMO is no less worthy or having a house in bath than someone that can afford to buy their own house. You will end up with a city full of old people, who drain rather than contribute to the bath economy as you isolate any young people as they cannot afford to buy houses with the current house prices. Try limit the house prices/stop selling to awful landlords, if you want to reduce the HMO amounts.</p>
Mrs Briony Smith	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes I agree with the general approach of the SPD to manage concentration of HMSOs in Bath.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes Every much agree with the Sandwich Policy proposal in the draft.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes I agree with lowering the threshold to !0%. How will this affect areas, such as those in Oldfield Park that are already 25% or over already? Will HMSO houses be put back into circulation</p>

	<p>for families, if they come up for sale?</p> <p><u>Question 4 Any further comments?</u></p> <p>What will be done about HMSO houses that are not fit for purpose but taken by students because the demand for accommodation is so high? Letting agencies and Landlords seem to be taking advantage of the situation. How do you ensure that Landlords get the required licence? Can you take the universities to task for building overpriced student accommodation that only foreign students have the funds to rent?</p>
Mr Robert Cook	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No. The area-based approach is flawed, as it ignores the reasons that students clump together, namely that services aimed at them, especially transport, force this: must live near a bus route serving their campus, or own a car, which is both expensive for the student and increases congestion in Bath. Few areas of the city are amenable to a student budget, and so they cluster in these areas. The suggestion in certain letters to the Chronicle that students are somehow ungrateful for not living in purpose-built student accommodation is not correct: these blocks are both far too expensive for the average student and are less part of the community than HMOs. It must also be remembered that HMOs are not exclusively student residences, as they provide a low-cost housing solution for people on low incomes, and in a market with house prices far beyond the reach of young working people.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No. The sandwich policy is a measure designed, presumably, to protect a resident from excessive noise from two sides of their house, but there is already sufficient legislation to deal with this problem, as the noise abatement orders can be issued: these</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No. The area affected by the policy becomes unacceptably large, covering a large proportion of the city, including at least some of all affordable areas, and all of those with transport connections to the campuses. This will force students to commute from</p> <p><u>Question 4 Any further comments?</u></p>

	<p>While concerns about loss of community in areas of Bath are understandable, students can form a key part of that community, and are a great driver of the local economy. Students not only provide a large proportion of the workforce in low-paid unskilled work, especially in hospitality, but also provide the demand that allows so many of the city's businesses to continue: without students there could not be as many pubs, bars, clubs, coffee shops, clothing shops, etc in Bath. As for community, the responsibility falls on both students and longer-term local residents to reach out and talk to their neighbours.</p> <p>If the council has concerns about the increasing number of students in the city, they should liase with the universities to manage the increases in student numbers: actions against students are both ineffectual and unfair. Current government policy towards higher-education funding incentivises their expansion, and so to solve the root cause the council must lobby the government to better fund the HE sector.</p>
Miss Annabel Young	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p>
Mr Duncan Toms	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No. This will drive up the cost of rent in an already inflated market. Students cannot afford to pay such high prices for rent, particularly those from a poorer background. Additionally, conditions within student accommodation will receive even less attention - mold, bugs etc which are</p>

	<p>already the norm will not be dealt with. The desperation of students to find somewhere, anywhere to live leads to a serious lack of welfare.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No. Same as above.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No.</p> <p><u>Question 4 Any further comments?</u></p>
Mr Peter Jones	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>I have experienced the effects of whole suburbs of a city (Birmingham) being converted for student residence purposes and would very much regret it if the town in which I now live were to evolve in a similar direction.</p>
Mr Adwaye	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree</u></p>

<p>Rambojun</p>	<p><u>with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>I feel that the whole housing policy is highly discriminatory towards students living in Bath. This is strengthening the trend in higher education where students are being loaded with more and more debt. I also understand that the limited availability of housing coupled no checks on the number of HMOs will highly distort the housing market in Bath and hence push permanent residents outside of the city. This would greatly impact the social structure of the city, especially during holiday periods. However, student welfare should be as much of a concern to the council as resident welfare is.</p>
<p>Mr Matthew Church</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>I agree with the general approach of SPD to spread the student population across the city. However, as significant developments including transport and supermarkets have been and will continue to be focused on this area it makes it a more desired location to live in as students. The reason for this is that the vast majority of students do not own cars so unlike most residents in other locations across the city they are unable to travel or it is costly to travel larger distances. So although I believe the approach of the SPD is beneficial for the community, I do not believe it is beneficial for the individuals within HMOs without increases in the development of the transport system as a minimum.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>This is something I can strongly agree with as it will reduce tension between residents of HMOs and other residents.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>I cannot agree with this change as it would dramatically affect the residents of HMOs for worst. As everyone is aware students occupy the vast majority of these HMOs, and as most students are heavily reliant on public transport (due not owning a car) it w</p> <p><u>Question 4 Any further comments?</u></p> <p>The simple fact is that this city needs more housing for students and young people not less. This is a problem for all residents to face together, so the residents of HMO's should not be forced to take the fall for everyone else.</p>
Miss Megan Richards	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>There are lots of students in bath yes but this number is not the fault of the students. So why should they be punished by being unable to find housing. They do bring a lot of money into the local economy. And in my previous house we were friends with the local residents next door. These changes will discourage people from attending a world class university.</p>

<p>Mrs Helen Halliday</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes. Too late for us, though - a house of four at one side, a seven bed on the other.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Definitely.</p> <p><u>Question 4 Any further comments?</u></p> <p>Living on West Avenue, we have the issue of HMOs and commuters, so I would like to see residents parking brought in.</p>
<p>Mr Ben Hallman</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>I don't understand it!</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Definitely. In a perfect world it would make no difference but unfortunately HMOs- often student houses- are frequently more messy, noisier etc. Ideally the money would be available to educate HMO residents in terms of making them more aware of their resp</p>

	<p><u>Question 4 Any further comments?</u></p> <p>No, but thank you for consulting us</p>
Mr Ian Hayman	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>yes</p> <p><u>Question 4 Any further comments?</u></p> <p>The threshold rule seems to be very easy to circumvent at the moment. So the rule should be max no of HMOs in street, 50m radius and 100m radius should all be no more than 10%</p>
Miss Stephanie Barnes	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>For reasoning please see Ben Palmer's responses to this consultation</p>
Miss Christine Turner	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No, it is far too drastic and will affect many many people, mostly young working people and students.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>The sandwich policy is the most reasonable of the proposals in my opinion but I am still worried about the effect it would have on young professionals and students.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Absolutely not. This reduction is far too drastic and will negatively effect a large proportion of the population of Bath, because students count as residents too and should be treated as such. There are already too many students in Bath for the number of</p> <p><u>Question 4 Any further comments?</u></p> <p>It is the council's responsibility to try and bring in policies that suit as many people as possible, but with these proposals, it is clear students and young professionals have not been considered at all. Students may not necessarily live in the HMOs all year round (although they are paying rent all year round, so should be treated as permanent residents), but it doesn't make them any less important than any other Bath resident.</p>
Mrs Maria Humphries	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree</u></p>

	<p><u>with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>Appreciate not directly related to this consultation but there needs to be something in place to ensure that HMOs are appropriately managed and maintained both to protect those resident in the HMO but also to not have a negative impact on the surrounding area.</p>
Mr Kevin Swaine	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>I agree in principle however I am concerned that the approach to implementation of the policy appears to be more in the spirit then the letter of the act, with some areas having an extremely high concentration of HMOs</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>I feel that this is a step in the right direction, as there appears to be an over whelming need for family housing in this area.</p> <p><u>Question 4 Any further comments?</u></p>

	<p>I am very worried that some of the new developments are being allowed have limited or even no parking for cars, this means that people who have to have a car for work etc. are going to have to park around the area annoying the existing residents. There is also the problems of unloved gardens and rubbish and collections. Would it be possible to limit the number of students allowed by the universities to the size of the accommodation on the campus? Thus providing more family homes (which is what the houses were originally designed for).</p>
<p>Mr Kevin Swaine</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>I agree in principle however I am concerned that the approach to implementation of the policy appears to be more in the spirit then the letter of the act, with some areas having an extremely high concentration of HMOs</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>I feel that this is a step in the right direction, as there appears to be an over whelming need for family housing in this area.</p> <p><u>Question 4 Any further comments?</u></p> <p>I am very worried that some of the new developments are being allowed have limited or even no parking for cars, this means that people who have to have a car for work etc. are going to have to park around the area annoying the existing residents. There is also the problems of unloved gardens and rubbish and collections. Would it be possible to limit the number of students allowed by the universities to the size of the accommodation on the campus? Thus providing more family homes (which is what the houses were originally designed for).</p>
<p>Mrs Ros Foreman</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Definitely Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>Oldfield Park is saturated with HMO's. Perhaps no more should be permitted at all but 10% is better than nothing.</p>
Mr Taylor De Caux	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No I do not agree. This will only increase the struggle of student accommodation in an already restricted city that has a serious housing issue.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No, this new Sandwich policy will again massively limit the number of existing and future HMO's worsening the student accommodation issue.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Not at all, The student/young working population in bath is continuously increasing with very little being done in the way of affordable housing and will become a large factor in potential students decisions to attend University here.</p> <p><u>Question 4 Any further comments?</u></p> <p>The combination of these two policy's will push Bath's student accommodation issue even closer to breaking point, ensuring that only a small percentage of students with strong financial backing can comfortably live in bath throughout their time at university due to extra incurring cost being added to students already overwhelming debts.</p>

MR Alan Cox	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>In principle yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>yes most definetely</p> <p><u>Question 4 Any further comments?</u></p> <p>The hmos in the oldfield park area should should be family homes not hmos. My two sons and all of my nieces and nephew have had to move away from bath as they could not afford to buy or rent. The students bring their cars with them, park them up, and then leave them for days on end and residents then find it hard to park anywhere near their homes. Just to many students in one area.</p>
Mr. Peter Guard Smith	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p>

	<p><u>Question 4 Any further comments?</u></p> <p>The sooner the better!!</p>
Mrs Phyllis Smith	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>This Ward has being ruined by the inbalance of the HMO's.</p>
DR Simon Vanstone	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>NO</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>NO</p> <p><u>Question 4 Any further comments?</u></p>
Mr Conor Smith	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No, not at all, this doesn't solve the root of the problem and only serves to punish students.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No, people should not view being surrounded by two HMOs as a negative, almost all Bath students are well behaved, polite young adults who are all too often stigmatised due to the actions of a few.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No, once again this only serves to punish students and will not fix the issues.</p> <p><u>Question 4 Any further comments?</u></p> <p>Instead of these proposals, which only serve to punish students themselves, the council should work in cooperation with the University student unions to impress upon the universities that the number of students they take on each year is unsustainable and it should be equally their responsibility to ensure enough suitable accommodation is available for their students. Pursuing this course of action would be much more beneficial for all, instead of persecuting students as the route of the problem, where we are huge contributors to both the economy and society of Bath.</p>
kathleen white	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p>

	<p>yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>yes</p> <p><u>Question 4 Any further comments?</u></p>
Mr Geoff Metselaar	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>YES.We fully support the implementation of the proposed SPD to manage HMO's in Bath. Sadly, this is 10 - 15 yrs overdue with HMO density in Oldfield Park, Westmoreland and Twerton at unacceptable levels</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>YES. As a household already having a HMO one side of us, we are fearful to have another HMO on the other side. So, yes we desperate to have the protection of the proposed Sandwich policy.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>YES. Absolutely in agreement in lowering the threshold to 10%</p> <p><u>Question 4 Any further comments?</u></p> <p>I'd like this taken a step further. Implement a HMO moratorium in the 3 most heavily affected areas (Oldfield Park, Westmoreland and</p>

	<p>Twerton) The most important part of this SPD is the council's determination to implement / defend and police this supplemental planning policy. If all it takes is refused applications being referred and overturned by the governmental planning inspectorate then this proposal isn't worth a great deal</p>
<p>Mrs Veronica Platt</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>YES</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>YES</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>YES</p> <p><u>Question 4 Any further comments?</u></p>
<p>mrs jacqueline greenslade</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>YEs</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>YES</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p>

	<p>YES</p> <p><u>Question 4 Any further comments?</u></p> <p>The change in the community has been immense and our friends have nearly all moved away because of all the HMOs</p>
<p>mr Donald Greenslade</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes I do</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Most definitely</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>YES</p> <p><u>Question 4 Any further comments?</u></p> <p>Hurry up and get on with it PLEASE!</p>
<p>Mr Brian Godwin</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>What is the Sandwich Policy?</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes this should be lowered to 10% or lower</p> <p><u>Question 4 Any further comments?</u></p>
Mr Ian Plain	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes , But officers and Councillors should be minded to reject an application where objection have been raised by neighbours and officers should take into account local knowledge and comments,</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes I do but in the case of culdisacs and closes this should take account of the whole road. the 25% rule at present can mean in a culdesac where HMOs are spaced out the 100M density is less than 25% but if the whole close is taken into account it is hig</p> <p><u>Question 4 Any further comments?</u></p> <p>where objections have been raised by neighbours, officers should take into account local knowledge and comments all too often an application will have multiple objections from neighbours stating that there is an issue with parking and this has even been the case with retrospective application and Highways have stated that they support the application. Their reason for support is based on their incorrect reading and interpritaion of a DCLG report. The highways department say that this report states that rented houses have, depending on who penned teh Highways report 50% less cars than a owner occupied property or 0.5 less, BOTH of these are wrong and this has been confiirmed to me by Hon Don Foster who was at DCLG at teh timeof the report. The report states that on a Like for Like basis a rented property has 0.5 less cars, BUT key here is the like for like the comparisons were of family homes not</p>

	<p>HMO's it is accepted by most councils in the UK that HMO and student houses have more cars and DO cause a parking issue. Surveys in Oxford and Cambridge has proved this. I will take our own culdesac it now has 8 HMO these 8 houses have each year between 14 and 19 cars. The road has 36 houses and only 19 spaces. as some NON HMOs have a drive but 19 houses do not, as there are also 2 HMOs in teh next road that is in a RPZ they also parked their 7 cars in our road, or at least tried to. All this was pointed out to officers when a HMO appliction was submitted but was ignored and the landlord (absent as lives in cornwall) was told to build a Bike shed. This has never happened. I urge you to instruct highways to stop using teh DCLG response to applications as it is wrong .</p>
<p>Mrs Claire Dustin</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes definitely. in our ward there are some roads that have more than 25% HMO</p> <p><u>Question 4 Any further comments?</u></p> <p>The HMO's not only destroyed the community but the amount of litter and rubbish has gone up as well.</p>
<p>Mrs June Player</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p>

	<p><u>Question 4 Any further comments?</u></p>
Mr Ian Cowie	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>Too many Bathonians are concerned about this problem for the Council not to take action. It's time to give back to local young people the chance to get into the property market for the long-term good of our city.</p>
Miss Heather Livings	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No, although I feel strong housing management is important, particularly when those who are more vulnerable are concerned. The approach that is proposed will be a negative influence on the community.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No I do not. I believe it is designed to protect an imagined pearl clutching, perceived base line of constituents from a vicious, outdated, and invented stereotype about young people (the primary occupants of HMO's), seeking to solve a problem that is lar</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No, this policy is worded as an attempt to control landlords but will have the practical effect of forcing people who depend on the city and are statistically less likely to have there own cars (The city does think kindly of bikes in some places but it is</p> <p><u>Question 4 Any further comments?</u></p> <p>I think this particular way of addressing housing in Bath is more discriminatory than it will be helpful. Not that I think this was created with ill intent but that in reaction to a problem this measure attempts to restrict the weakest people in this situation (the tenants) more than anyone else.</p> <p>If the problem is poorly maintained property's then this should be taken up with landlords specifically, this response will only make the tenants lives more difficult, when meany of the have little control over how the property is maintained, and if anything give landlords less incentive to maintain their property's when they have a captive pool of tenants and less competition for housing in a market that is already short HMO's. Perhaps insisting on a higher standard of maintenance would be more appropriate.</p> <p>If you want to encourage dense populations of students to live over a wider area, making their likes more difficult when they are already being manipulated and are constrained in their choices of housing more than most, feels counterproductive. Perhaps it would be better to invest more in public transport and make living outside of the city easier, not living inside the city harder. The lure of better housing at the other end of a comfortable bus journey might prove more effective than simply making housing scarcer and resultingly, prices higher and quality of life lower. Or if this is difficult, maybe just addressing the amount of housing closer to the university's and with better access, that simply refuses to rent to students. Based on outdated stigmas and prejudices.</p> <p>If the problem is the lack of community resulting from short term leases perhaps more community events and spaces. Keeping the public and commercial area well maintained, to encourage integration and cooperation between neighbors.</p> <p>In short I believe that any problems this change would solve could be addressed more directly. and that this measure will reduce the visibility of the problem, whilst lowering quality of life in the area and encouraging neglect and financial abuse from a group that already has the upper hand on a much more desperate party.</p>
Mr Istvan Schuller	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p>

	<p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
mrs janet palin	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>I agree</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>I agree</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>I agree</p> <p><u>Question 4 Any further comments?</u></p> <p>I feel that we should not let family life be interrupted by too many (h m o)s</p>
Mr Paul Brake	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p>

	<p>In general, yes but with reservations about the limit.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Absolutely yes.</p> <p><u>Question 4 Any further comments?</u></p> <p>This change is needed with immediate effect. Whole streets and communities are being torn apart because every house that comes on the market, especially in Oldfield Park, is snapped up by a landlord for HMO use. Young families have no opportunity to get on the housing ladder in Bath so children who were born and raised in the city have no opportunity to start a family here. Reducing the limit to 10% will discourage landlords and ensure that properties which are coming on the market at an affordable rate have the opportunity to be bought by young families.</p> <p>The limit should also apply to postcodes, not 100m areas, as this is easily distorted by streets of non-suitable HMO housing.</p>
Mr Tom Ruddell	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No - the proposal is not a holistic plan because it aims only to prevent high concentrations of HMOs in Bath, and thereafter takes no influence in what might happen next in the city to meet the demand for HMOs. Therefore, it does not carefully study the actual impact the plan would have on the city - HMOs would likely be developed in a greater portion of the city, in areas that are too expensive for students or with poor transport links. Young adults seeking affordable housing would also be affected. Local inhabitants would be impacted more.</p> <p>The study also mentions a possible decrease in student intake at the University; in fact this has not been observed, and intake continues to increase at the same rate SINCE 1994. (http://www.bath.ac.uk/student-records/statistics/stats-time-series-1-dec-gender.pdf). How can a conscientious planner endorse a housing plan which observes this predictably continual increase in demand for HMOs and conclude that</p>

HMOs must be further regulated, with no alternative solution for student accommodation?

A quote from your 2011 study:

"Oxford

Oxford is home to two large universities; the University of Oxford and Oxford Brookes University.

Oxford City Council has incorporated a policy into its emerging Core Strategy¹⁷, stating that:

"All increases in student numbers (at Oxford Brookes University and the University of Oxford) as a result of increases in academic floorspace must be matched by a corresponding increase in purpose-built student accommodation."

This approach helps to protect against future growth in student numbers proportionately increasing the demand for unregulated student housing."

The council must recognise the economic multiplier effect of students in Bath - they bring world-class research and therefore spin-off businesses to the region, they invest their fees into the University and therefore the staff and all number of goods which support the university. They support a huge variety of tertiary industries; restaurants, bars, transport etc. This is money that will be invested into a different university, and a different city if the housing situation for students is not addressed.

Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?

	<p>Perhaps - however is it possible to seek the consent of the "sandwiched" houseowner?</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No. I find this the most bizarre proposal. For a start, let me quote your 2011 feasibility study again to address the problems/benefits of HMOs in Bath. Negative Effects (section 4.3, page 30) Affordability – no study, data or even explanation is present</p> <p><u>Question 4 Any further comments?</u></p> <p>In summary, I do not see conclusive evidence or data to support any issue in the community that can be addressed by these proposals, or indeed that would require reduction of the HMO supply. I also do not agree with the proposal to limit HMO density from 25%, further to 10% within a 100m radius. I believe this would exacerbate many of the issues suggested in this report, including disruption to local inhabitants due to noise, as students are forced to live across the city. Transport would be a greater issue. The affordability of housing for students and young working adults would worsen. If anything, I view the greater density of students in one area (for example, Oldfield) as being the most efficient way of accommodating them. They will disturb local inhabitants less and they will have easier transport links, which prevents buses from having to circumnavigate the entire city. Please refer to pages 41 and 42 of the 2011 Feasibility report; option 1, which has been chosen, leads to a few positive effects, and many concerning negative effects, many of which mirror my concerns. I implore the council to reconsider these changes in favour of a plan which firstly understands the issues in depth, then addresses them with respect to all stakeholders.</p>
Mr John Ferrie	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes I do. While superficially this may look like discrimination; it is not as the student body has some particular characteristics which naturally divide it from the rest of the population. Amongst those are the absence for about 1/3 of the year, the age range -generally 18 to 23- which is very narrow and gives some difficulties with other residents e.g. young families and the elderly; except in rare cases the students are</p>

	<p>tenants not house owners giving them little or no incentive to improve the appearance of the house.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes indeed.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes. 25% of any population of differing life styles(see answer to question 1)form a large enough body to skew the living conditions of the majority without any malice of thoughtlessness.</p> <p><u>Question 4 Any further comments?</u></p> <p>Should it become policy that for any new HMO the council inspects the property regularly boith when occupied and when empty to ensure the young peoples safety.</p>
Mr Rowan Saunders	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Absolutely not, it is already difficult enough to find shared accommodation in bath.</p> <p><u>Question 4 Any further comments?</u></p>

	<p>There are too many students in Bath, and not enough accommodation. This issue will not be solved by capping the amount of accommodation available. The only way to solve it is by capping the universities intake of students. Communicate with the Universities to reach a solution together. The suggested changes are punishing students for something that is way beyond their control.</p>
Mr Denis Lovelace	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes, subject to the reservations given in response to Question 4</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>(1) There should be a distinction between HMOs for the transient student occupation and other residents. Students frequently have no awareness of the need for good housekeeping so there is no supervisor or head of household. (2) The council should have an authority to enforce owners of student occupied HMOs to maintain the street frontages, such as gardens and walls.</p>
Mrs Jenny Bakhoff	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>Had enough of hmo applications being permitted in Bath Keep houses for locals. There is enough student housing Being built already</p>
Mr Martin Bakhoff	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p><u>Question 4 Any further comments?</u></p>
Mr Martin Bakhoff	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p>

	<p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>I feel so that there are too many HMOs in Bath at present & a reduction would benefit the community as a whole</p>
Mrs Helen Bendle	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
Mr Philo Waddell	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>I think the proposal to manage HMO's in Bath without any long term plan to produce an alternative housing solution is ludicrous. I understand that there are several student blocks in bath, either in the planning stages or in construction, already; however their total capacity is far lower than the projected growth of the student population. In addition, this doesn't account for HMOs that are converted back to family homes. As I understand from the SPD, this will be an irreversible process should the property dwell in an area where there is a concentration of HMOs is over 10%. I also object to how it is inferred by the proposal that the only residents of HMOs are students and that all HMO residencies are a nuisance to the community and hence need to be controlled and managed. As has been pointed out by a local paper, by reducing HMOs it is only solving half the problem as the root of the problem lies with the constant expansion of the universities.</p>
Mrs Tracey Alvarez	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>YES</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>YES</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>most definitely yes.</p> <p><u>Question 4 Any further comments?</u></p>
Mr Christopher	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree</u></p>

Alvarez	<p><u>with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>YES</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>YES</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>YES</p> <p><u>Question 4 Any further comments?</u></p>
Mrs Christine Randall	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>yes</p> <p><u>Question 4 Any further comments?</u></p> <p>There are far too many HMO's in our area, in the summer when the students have all gone home the area once more becomes a community</p>

	<p>with plenty are parking spaces, less rubbish and less noise. We have children that would like to buy a home in the area but of course this is virtually impossible. It is time to stop the greed of landlords and for once the council needs to concentrate on the needs of the local people.</p>
<p>Mr Robert Goodman</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
<p>Miss Vicki Maher</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No, I feel this is a major concern for students and young people. It is already a struggle to find housing in Bath, especially those which come at an appropriate price, Bath is a very expensive city and the majority of housing is expensive and only offered for 12 month contracts, which as a student means I am paying an extra 3 months for a property I am not using. Quite franky I see this as an attack on students, something which challenges our living arrangements and style of life, which is perhaps not comparable to ordinary constructs.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>I can understand the concerns for residential properties, however I do not think this is fair, it is simply promoting the needs of ordinary residents over students, surely this is age and social class discrimination? It suggests that the needs of other re</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No, as I have earlier addressed this is a way to cut down on student accomodation, something which in the city of Bath is already in high demand, but low availability.</p> <p><u>Question 4 Any further comments?</u></p>
Mr Jack Sparrow	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>I would like to see the owners of HMO properties paying either Council Tax or Business rates. They are using the Council facilities and running a business.</p>
Mr Jack Sparrow	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>I would like to see the owners of HMO properties paying either Council Tax or Business rates. They are using the Council facilities and running a business.</p>
Mr Jack Sparrow	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>I would like to see the owners of HMO properties paying either Council Tax or Business rates. They are using the Council facilities and running a business.</p>
Mr Keith Brynmor Jonesu	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree</u></p>

	<p><u>with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>None</p>
mrs E Hearn	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>yes, I think that more control should have been in place sooner in Oldfield Park and surrounding areas.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No - I think this has the potential to set the value of one house against it's neighbours. Enforcing 3 below is more important.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Absolutely YES. And I think that any landlord with an HMO who has not yet been licensed should not be allowed retrospective HMO license from a date (as soon as possible). There are too many out there getting away with it. I Also think if a landlord sells</p> <p><u>Question 4 Any further comments?</u></p>

	<p>See comments above. HMO's are only one part of the student accommodation problem. The big housing blocks with millions of students packed into little rabbit hutch style studios are not the way forward either. The Wansdyke Business park proposal is really badly designed - students mental health has to be damaged by this design. It is time Bathnes put back a limit on the number of students at the Unis and looked more strategically at where to put them all for the benefit of existing communities and of the students. HMO's are not just for students - where's the affordable accommodation for young couples looking to stay on in Bath and build careers?</p>
<p>Mrs Anita Garrett</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Definitely YES and even lower if possible.</p> <p><u>Question 4 Any further comments?</u></p> <p>Time for the Planning dept to find the middle ground - previously it was notoriously tight on restrictions, recently it has become too lax and so we find ourselves without enough housing stock for our young people who have to move away from their families. Us oldies who remain have to put up with a reduced quality of life due to excess HMO's.</p>
<p>Mr Christopher Wilmot</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>10% is the maximum I would agree with . Given that most student HMOs have between 4 and 5, or even 6, people in them, and most other homes have between 1 and 4 people living there, then simple maths would indicate that a 10% threshold of HMOs would mean up to 20% students in the area, which is more than enough for a 'Balanced Community'.</p>
Miss Hayley Whitehorn	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No - whilst I agree about one or two points, I think the approach of the SPD is detrimental to the community of Bath, to people's livelihoods, and most of all to the universities and their students.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes - it would be wiser to place HMOs next to each other, and residential properties surrounding them, instead of sandwiched inbetween.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Absolutely not. There is a high demand for HMOs; that is already outweighing the supply. It would be most unwise to lower this number at all, let alone in such a dramatic swoop. Constrastingly, it would be a more economical decision to increase this by 1</p> <p><u>Question 4 Any further comments?</u></p> <p>Whilst I agree about not sandwiching residential properties between HMOs, I think the proposal would be detrimental to the community of</p>

	Bath, to people's livelihoods, and most of all to the universities and their students.
Mr Michael Rawlings	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>YES, the concentration of HMO's in some areas and the overall number generally should have been halted long ago. Greedy landlords have bought up family houses (from which council tax was collected) and converted them as a profitable business opportunity (property value increase plus rental income) yet pay no council tax or business rates so reducing revenue to the council. Owner occupiers are then faced with increased council tax. It is simply unfair.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>YES. but see my Q4 response below.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>YES, as a minimum. See my Q4 response below.</p> <p><u>Question 4 Any further comments?</u></p> <p>YES. I am quite happy for Bath to have a student population. I am not anti student and realise that they bring economic benefits and a vibrancy to the city. My complaint is not with students but with the wealthy Universities who have profited from increasing the numbers of students whilst failing to build sufficient on site accommodation (they seem to have plenty of land) which has led to the current situation. The solution would be to refuse the development of any more HMO's. The Universities would then have the choice of building on their own land or limiting their student intake. Also, could the council look into the possibility of raising some sort of revenue from the landlords of HMO's.</p>
Mrs Dawn Handley	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p>

	<p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes I agree houses should not be sandwiched between HMO's.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes, the council need to make sure their records are up to date with all HMO's being registered and forced to keep their properties maintained, clean, and safe. Many properties are not maintained and residents are not informed of their responsibilities.</p> <p><u>Question 4 Any further comments?</u></p> <p>There are too many HMO's in Oldfield Park already and permission is still being granted for more HMO's (Ivy Villa's, Ivy Avenue) even though the council believe we are not at a full 25% capacity. This is crazy, are all HMO's registered along Coronation and Ivy Avenue? Current HMO's are having loft conversions completed to allow even more people to occupy these properties. The council has no control over this situation and landlords are the only ones benefiting. Houses are neglected, gardens are not maintained and residents are paying a premium for living in poor conditions.</p>
Mrs Claire Wilmot	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>

Dr Nigel Long	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes we strongly agree with the approach to HMOs in parts of Bath. Although primarily concerned with rural issues we think it desirable that as much housing in Bath as possible is retained as family housing rather than for multiple occupation.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes this seems a very sensible policy to protect local residents.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes this seems a very reasonable figure to keep housing for families.</p> <p><u>Question 4 Any further comments?</u></p>
Mr Raymond Welham	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>YES</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>YES</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>YES</p>

	<p><u>Question 4 Any further comments?</u></p> <p>This is all to little to late.The damage has been done to this area, and now the owners of the HMOs are excavating the basements to provide even more bedrooms and the council can will do nothing about it. My house has been shaken to the foundations even though no Party Wall Agreement has been signed. The motto is Do what you want when you want then if required apologise profusely and no one will care. The end does not justify the means.</p>
Mrs Charlie Prince	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>It is about time that some measures like this were introduced!!</p>
Ms Jean Lowe	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>Control of HMOs is essential to maintain the character and functioning of local areas and the proposals in this SPD are fair and practical.</p>
	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>I looked at the detailed planning documents explaining the situation and the proposed revisions but found them hard to understand, and assuming a prior knowledge of the status quo. The New proposals need to be set out in context and the terms like HMO threshold clearly explained. I had to ring my councillor to get a clear picture. Please bear in mind for the future that we don't all have the background knowledge to this situation.</p>
Ms Jean Lowe	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree</u></p>

	<p><u>with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p><u>Question 4 Any further comments?</u></p> <p>I submitted my response earlier this morning but wish to add the following to my earlier comments:- Control of HMOs MUST also be linked to the level of student housing permitted in any individual residential area. Student housing, while not designated under the same housing regulations, introduces very high numbers of young people who would otherwise be in HMOs, thereby having a huge impact on the character and functioning of that area. This consideration very badly needs to be added into the otherwise excellent suggestions in this draft SPD.</p>
Mr Alan Langton	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>I am now secretary of the Widcombe Association, which is likely to make its own response. This one however is in my personal name. I have</p>

	<p>met and in some cases know settled residents who currently suffer considerably from the over-concentration of HMOs. There should also be a policy to look closely at the number of PBSA developments in the City, displacing potential general residential development opportunities, plus - importantly - positive measures to provide for students and others in need of affordable accommodation.</p>
Mr Tony Jiggins	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Broadly, as a Landlord for over 20 years, I do agree with some regulation to manage the concentrations of HMO's around Bath, but with the caveats that I have outlined below in the 'other comments'.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes, this does seem sensible</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No I dont - this smacks of discrimination on an already pressured sector of vulnerable tenants who can neither afford their own place, nor pay the higher rents in other areas. Bath is not 'fliud' with regards to spreading out HMO's. Trying to 'manipulat</p> <p><u>Question 4 Any further comments?</u></p> <p>The principle and practice of HMO regulation has turned out to be mutually incompatible in reality with the usual unintended consequences arising. These were seen, and pointed out originally in 2013, but seemingly ignored. As a result, certain areas such as Oldfield Park have become a 2 tier area with regards to property values. Residents have seen the values of their homes stagnate or drop, and HMO's have seen their values rise dramatically. This was not want I wanted to see, and it was originally pointed out as scaremongering. I sold two HMO's in the area recently, which I had owned and rented for nearly 25 years, and my request to a local estate agent was to primarily focus the sale to families or young couples, even if it meant it would take longer to sell. I wanted to 'give something back' to the area. I was told that due the consequences of Article 4, I would have to be prepared to take a £30,000 drop in price on each house to achieve that. I swallowed hard, but asked them to try anyway. Despite that reduction, I had zero takers, but plenty of professional investment offers. Of course, I could not afford to to ignore them.</p> <p>The principle of 'dispersing HMO's across the city' to 'avoid concentrations' in your Equality Impact Assessment is prima facie sensible, but in</p>

	<p>practice unworkable in Bath, despite the 'feeling' mentioned in 2.10 of your FAQ's. The spread of property values across Bath mean that inevitably, these concentrations exist for a reason. In practice, expensive areas will never have affordable HMO's, and this will have the unintended consequence of actually becoming discriminatory on tenants who can only afford to share. They will be marginalised, and have to move out of Bath, or even elsewhere. This is discrimination - it cant be hidden. Do we want to turn Bath into a city for the wealthy only? Reducing the levels from 25% to 10% will do exactly that. It will NOT spread properties out around the area. It will mean that shared houses and flats, which are obviously popular with young people because they provide affordable housing, will discriminate against young people who are valuable to the local economy – they use the shops, pubs, takeaways and cafes and restaurants. Drive them away and the businesses will go too. Moorland road has thrived again - just drive along it and take a look.</p> <p>I have been involved in this for over 20 years and do not say this flippantly.</p> <p>I am personally leaving the rental market so it will not affect me as such, but speaking with other landlords, I know that further implementation of this will stop landlords renting shared houses/flats to families – because they will risk losing the existing rights of shared houses. It's already caused the value of owner-occupied houses to fall, by up to 30% – because the market for buyers is reduced, and shared house landlords will be effectively excluded.</p> <p>These measures are generally the wrong legislation to deal with social problems perceived by other residents.</p> <p>Just my 2p worth..</p>
Mr John Randall	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>YES</p> <p>Although I do think it's too little too late, the damage has already been done by an irresponsible, finance orientated, university and council.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>YES</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>YES</p>

	<p><u>Question 4 Any further comments?</u></p> <p>The university needs to be held more accountable for the impact that it's own ongoing expansion and increasing wealth has on the city. It's all very well saying that the students bring income to the city but they are indirectly funded by us anyway, most are running on large loans that few will ever be able to pay back.</p>
Mr Ben Davies	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>No</p>
Ms Nicola Meecham	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
Mr Bernard Morgan	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
Mr Simon Walshe	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Having read the document I agree with the stricter process proposed for granting permission for HMOs. It will prevent areas of Bath losing their sense of community, becoming run down or having too may cars.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>I strongly agree with this. The disruption this would cause, particularly in areas such as Oldfield Park where nearly all accommodation is</p>

	<p>terraced, would be significant.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Again I strongly agree with this. Some areas in Oldfield Park i.e. Lorne Road have seen families pushed out and a race to leave as you do not want to be the last non student house left in street!</p> <p><u>Question 4 Any further comments?</u></p> <p>I believe there should also be stricter rules regarding the maintenance of HMO properties and also better policing of things such as rubbish collection with more comeback on the landlords if there are frequent breaches by their tenants.</p>
Ms Bethany Humphries	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>It would be helpful if on-street parking was better managed in areas with high HMO concentrations e.g. introduction of residential parking permits in Oldfield Park to discourage multi-car households</p>
Mrs Sarah Chadwick	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree</u></p>

	<p><u>with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>"The aim of the SPD is to avoid high concentrations of HMOs in the interests of an appropriately balanced housing mix across the city"</p> <p>i do not believe their has been enough people on the council to actually implement and act on this where it is being deliberately ignored.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>"Planning permission would not be normally granted where the introduction of new HMO would result in an existing residential property (C3 non-HMO) being sandwiched by any adjoining HMOs on both sides."</p> <p>Again in theory this sounds like moving forward but</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes this makes total sense in a city as small as Bath.</p> <p><u>Question 4 Any further comments?</u></p> <p>I strongly feel landlords of HMOs should</p> <ol style="list-style-type: none"> 1. Pay council tax or some sort of tax to the council 2 Be held accountable for any antisocial behaviour of their tenants, by warnings, fines and licenses revoked.
Ms Trish Hill	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
<p>Ms Joanne Hilferty</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes. Students seem to be favoured as occupants, though my adult children have had difficulty finding shared accommodation in Bath. Do Airbnb houses count? There seem to be quite a few in Oldfield Park now.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes.</p> <p><u>Question 4 Any further comments?</u></p>
	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p>

	<p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>It's a good plan. Other benefits are parking (a 4-person HMO can mean 4 cars), and less mess on rubbish collection days (students take a while to know the routine, and short-term residents sometimes never learn it or have no stake in doing it right). We've had an HMO next door for years; consistently nice people, quiet and friendly. But about 30% of houses on our road are HMOs & the road does suffer from these issues.</p>
Dr Jeanette Cook	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes. If you are going to let the universities expand in an uncontrolled manner the least you can do is limit the concentration of different types of residents.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Absolutely, although for certain houses and streets it is too late and the lack of this policy has resulted in some street nearly being 100% student housing in Oldfield Park (or maybe the council should buy those sandwich houses that exist already and ren</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes, we should have a diverse selection of residents in all locations in Bath.</p> <p><u>Question 4 Any further comments?</u></p>

	<p>If the council does not think strategically about the number of students and work with the universities, they will continue to expand (as businesses seeking a profit) and there will be an every increasing number of undergraduate and graduate students (note there are 2 types and limiting one just means the universities expand the other).</p>
Mr Jeff Butler	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No. It is far to widespread and appears to be another attempt to raise more funds for the council.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No. This is far to restrictive and unreasonable. HMO's provide a valuable housing resource which is much needed.</p> <p><u>Question 4 Any further comments?</u></p> <p>The current approach is adequate if used correctly by the council. This is a major restrictions in peoples rights. They should be dealing with the issues of Airbnb instead as this is a rapidly growing problem which will massively impact available housing.</p>
Mrs Wendy Marquiss	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>YES Providing it is done fairly which at the moment it is not to many are allowed to be passed without knowing all the facts about the area.(In this area we are lucky enough to have our local councillor June Player to fight our cause at least she does listen to her constituents.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>YES but what about all the ones that have already been sandwiched this was done without any thought given to the residents who live in the</p>

	<p>area 24/7.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>YES definately.No 6 Albany Road is sandwiched between HMO's either side with 4 Students in each house. On the other side of the road 17,19 and 21 are Student lets a resident lives in No 23 then back to students living in No 25. once a house is let as HM</p> <p><u>Question 4 Any further comments?</u></p> <p>Not enough attention is given to the areas with the most congested areas of HMO's the parking the Nos of Students per property. On the right hand side of Albany Road alone between the Nos.2-28 there are 23 Students and 10 Residents that is just on this side alone Think of the council tax the council could collect if these Landlords had to pay even a portion of the council tax if they were made to pay even a small amount towards all the facilities that the residents have to pay for. Half of the landlords do not live in Bath and do not visit their said properties from one year to the next they are allowed to go into disrepair you only have to walk these street of Bath you do not need anyone to point out these HMO's the front of the houses tell the stories. Still every week there are properties in the Planning column of the Chronicle to turn houses from Residential to HMO's. Cannot the council stop all these for 6months or so and do a detailed survey of all HMO's in BATH and get is right.Finally how many Bath Councillors own HMO,s in BATH and the state of the said properties</p>
Mrs Heather Kale	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>yes</p>

	<p><u>Question 4 Any further comments?</u></p>
	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>In principle, yes.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes.</p> <p><u>Question 4 Any further comments?</u></p> <p>The effectiveness of this policy will depend on the actions of officers tasked with applying the criteria to HMO applications. On past form, some decisions appear to have taken little account of the realities on the ground, especially in respect to destruction of amenity. Confidence in this policy will depend on its application/interpretation.</p>
<p>MR MARK EDGELL</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes I totally agree. BUT concentration in some areas of bath namely Oldfield Park is much higher than the 25% currently , so why is this. Will this mean that licences being renewed will not get renewed if the concentration in the are is too high currently.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes totally , but some residents in my street have this problem already, so will you NOT renew licences</p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes I totally agree. BUT concentration in some areas of bath namely Oldfield Park is much higher than the 25% currently , so why is this. Will this mean that licences being renewed will not get renewed if the concentration in the are is too high currently</p> <p><u>Question 4 Any further comments?</u></p> <p>A Major crackdown needs to be implemented in Bath. The council needs to appoint a HMO/Student officer, who police`s the properties, from Waste management to safety checks, to ensuring properties have the correct licences. In the Street there are a few properties rented out to students with no recorded licence in place.</p> <p>There will one day be a Fire or a major emergency, and then people will ask why was that allowed to happen ??? Why are there 6 people , 7 people living in what was a 2 bedroom property. Why are the fire regulations not being followed, and why did we allow that happen.</p> <p>SOMEBODY NEEDS TO TAKE SOME OWNERSHIP OF THE PROBLEM</p>
Mr Nigel Hopes	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes to an extent. Whilst it will help stop the problem getting any worse, it doesn't deal with the past mistakes that have resulted in the proliferation of HMO's in Oldfield Park. There needs to be an additional policy that pro-actively reduces the number of HMO's that we currently have, over the coming years i.e. any HMO Property sold cannot be sold to another "landlord" and must be sold to a family.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes (although i think it should be even lower in Oldfield Park)</p> <p><u>Question 4 Any further comments?</u></p>

	<p>The make up of Oldfield Park, including the road i live in, has changed beyond recognition over the past 5 years due to the unacceptably high level of HMO's that have been approved. Having lived in Second Avenue for 23 years our lives are now being significantly disrupted due to the inconsiderate, anti-resident and pro-university policies that BANES have adopted. Parking is an absolute nightmare during term times and many cars are left outside houses for weeks on end as the student that owns it uses the bus to get to and from university. There is regular late night noise from students either holding parties or coming home in the early hours of the morning, there has been a huge increase in late night takeaway litter scattered in the street and many students seem unable to follow simple instructions on how / when to put their rubbish out. During the summer months Oldfield Park becomes a ghost town which whilst pleasant clearly demonstrates that you have got the balance wrong and the scales have tipped to far in the wrong direction. Your policies should now be actively reducing the number of HMO's in Oldfield Park and holding the Universities to account in terms of providing more accommodation.</p>
ms sian james	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>yes</p> <p><u>Question 4 Any further comments?</u></p> <p>HMO policy needs to be enforced, there are obviously many houses that are advertised as being let for students etc that are not on the HMO list (eg Locksbrook Road area). Universities need to take ownership of housing provision for students.</p>
Mr Robert Hamilton	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p>

	<p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
Mrs Chrissie Hamilton	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
Miss Helen Cameron	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p>

	<p>No, this is not going far enough. Westmorland has become a very unbalanced community with a seasonal population and problems which severely impact on permanent residents life in a negative manner.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes but could go further</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>This should have been implemented long ago and existing HMO SHOULD HAVE LICENCES REVOKED TO ACHIEVE TARGETS, PARTICULARLY WHERE THEY WERE GRANTED BEUSES OF GLIMSY EVIDENCE THEY HAD BEEN HMOS BEFORE SO WERE AUTOMATICALLY GRANTED.NA MUCH TOUGHER, JOINED UP APPROACH IS REQUIRED TO PRESERVE THE COMMUNIUNITIES WITHIN THE CITY.</p>
Mx Lu Bailey	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>To some extent. I know that a lot of residents are worried about HMOs taking over the city; however at the same time I have found it is rare for interaction to exist on the part of the non-HMO tenant. Community cohesion needs to exist from all parties.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>I somewhat agree with the sandwich policy; I know it is nice to properly know your neighbours over your garden fence and houses of multiple occupancy may change every year or else not be as communicative. However, I also think it's important to mix togeth</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Absolutely not. Bath has a housing crisis, especially for the young, and for a city with two universities it is unreasonable to lower the</p>

	<p>threshold. Students are paying through the nose for properties that are falling apart, all because of lack of choice</p> <p><u>Question 4 Any further comments?</u></p>
Mrs Pauline Cox	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>This has all come too late for our area of Bath. I don't think the council have listened to us in the Oldfield Park area. I live in an 18 house cul de sac and a third of the houses are HMOs. The parking is terrible, it has to be students, because during the holidays and Christmas there is no problem.</p> <p>I suppose these proposals are coming in because people who matter are going to be affected, They won't change the law for our road, I would like to know why it has happened.</p>
Miss F Harrison	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Not enough information given in plain English to understand fully the impact but from I have learnt, I have no confidence at present.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>Yes totally. Parking issues for current residents is already a problem. As is noise & rubbish pollution for many people living in streets with multiple HMO with little support or help available if complaints need to be raised. There is the obvious effect</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes 100%!! Parking issues for existing residents are not being taken seriously enough nor does available housing for people & families wanting to maintain or make Bath their home long term. Lowering can only, hopefully, make a difference this.</p> <p><u>Question 4 Any further comments?</u></p> <p>We are losing the community feel to many areas of Bath. It's increasing seen as a transient city and/or a place to live reserved only for those who can afford it. Parking is an issue for many residents as commuters & increased spaces taken by houses with students or professional in HMOs is making life on a day to day basis increasing awkward for those of us who need access to spaces close to where we live (sometimes parking even in the streets where we live is not possible). No consideration is given to those of us with children, disabilities, elderly residents or those that work from home and the everyday impact it has on our day to day lives when making the decisions to award licenses to HMO. The added noise from HMO's whether occupied by students or professional renters is not taken in consideration as absent landlords are often the case & letting agents are difficult to deal with, if we even know who they are. The increase in household refuse is exacerbated by the occupiers who take no pride or respect the local bylaws.</p>
Mrs Patricia Fosbury	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p>

	<p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
<p>Dr Robert Fosbury</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>I think there should be similar type of restriction applied to the number of houses converted to Air B&B usage as a business without a resident owner.</p>
<p>Cllr Jasper Beckrr</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>I think this problem stems from a raft of government policies which disrupt the market. The more that happens the more additional measures are required to counter the unforeseen consequences of the original interference. For example, the decision to send half the country's youth to university without considering where they were going to live. So I think you need to remove the original causes of the problem , remove the incentives, not add to the existing thicket of legislation. So Idont agree with this approach. It's bound to have unanticipated consequences.</p>

	<p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p>
Mr Paddy Doyle	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>Apart from the proposed measures, could some way be found for HMO landlords who let exclusively to students pay some sort of council tax?</p>
Mr Dan Powell	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p>

	<p>No it's a shambles!</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>You need to move them else where!they ruin community's and should be all be stuck in 1 place together!they are not wanted here!make the university build more hmo's on the land next to the uni away from real residents !when will u toff nose mps see this?you wouldn't have them up lansdown next to it ivory towers so don't stick them here!</p>
Ms Deborah Jane	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes, I think it important to avoid 'student ghettos' all areas of Bath should have a mix of housing - social, private, low-income, high-income, etc. Bath is made interesting by the diversity of its residents, which benefits everyone.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes - see above</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Definitely!</p> <p><u>Question 4 Any further comments?</u></p>

	<p>As well as housing issues, Bath has major traffic problems, partly as a result of having so many students here. Is there any way our universities can be encouraged to limit student numbers or are they wedded to the unrealistic and unsustainable growth model, which is so damaging?</p> <p>I like the new student blocks along the Lower Bristol Road - are these available for other uses during vacations?</p>
Mr John John	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes but do something now as my life is being made hell by noise of neighbors</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes & as above</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes & as above</p> <p><u>Question 4 Any further comments?</u></p> <p>This seems a little too late</p>
Mr Richard Luetchford	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes in part. I am however concerned that by restricting the number of HMO's this will inadvertently discriminate against young working people in Bath who need a room to rent and can't afford a larger place. This will be to the detriment of these people and to the local economy which employs them. The reduced number of HMOs this approach will lead to will be snapped up by landlords who will only offer their properties into the more lucrative student rental market. To prevent this happening, the proposed approach to HMOs should only apply to a more restricted class of HMO that more specifically targets student occupation. For example, HMOs housing 4 or more people from 3 or</p>

	<p>more households, and/or those with leaseholds of a duration of less than 3 years.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No. This will still lead to high concentrations of student HMOs in some streets of up to 50%, even though in the general area the HMO threshold is not breached. In addition to the Sandwich Policy, it should also be specified that no HMO should be permitted</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p>
Mrs Aileen Oldfield	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>In principle BUT, I firmly believe that the larger purpose built student blocks must also be counted as HMOs. And the number of students flats in each block must also be taken into account and be part of the 10%.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes but again the larger purpose built blocks must also be taken into account.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>definitely, although unless/until the council have permission from the government to put a cap on the number of students attending the two universities I don't see how this will work. The problem will just be moved about Bath.</p> <p><u>Question 4 Any further comments?</u></p>

	<p>If the council have the power then a property should lose HMO licence when sold, and there should be a cap on HMO licences per landlord. And perhaps licences should be for 5 years and then up for renewal.</p> <p>The council needs to stop giving planning permission to large developers who want to build Purpose built student flats with in the Bath area.</p>
Mrs Jo Ford	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>Action needs to be taken urgently to manage the huge saturation of HMO's in family-based, residential areas like Oldfield Park. The on-going balance of residents needs to be considered and prioritised, and family houses in the area near schools should predominately be for families as they were intended, not HMO's.</p> <p>The issues of the current saturation of HMO's are vast on many streets and within the area as a whole - unsociable behaviour, noise, litter, parking, use of amenities eg buses - the list is endless.</p> <p>Reducing the threshold to 10% is a sensible solution however it's not addressing the issues of streets that are already close to capacity. This new threshold should be seen as an absolute limit - not a target.</p>
Dr J	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p><u>Question 4 Any further comments?</u></p>
Dr Rob Branston	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>It is important that Bath is a community that works for all its residents. The documents seems to be based on the assumption that it is essentially only students who require HMO. However, many young professionals share housing so I suspect the need will be greater than that forecast. If the policy change is adopted it will force a wide dispersion of HMO over the city which will make existing traffic issues worse as individuals are forced to commute over longer distances. It would also force individuals to live outside of Bath which would have detrimental effects on both traffic and the demographics of those living in Bath. I think the existing 25% threshold protects areas from being totally overwhelmed. The 10% threshold would be too restrictive, and would represent over regulation.</p>
Miss Amelia Thompson	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree</u></p>

	<p><u>with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes the approach, in principle, seems reasonable.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>I don't really see why it is so terrible to have a 'family' house sandwiched between groups of single people living together. Most people who live in HMO's are as friendly and reasonable as someone in a 'family' house.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No. I believe it is completely unreasonable to reduce the cap HMO numbers in such a way, effecting both students and young professionals before tackling student numbers. While it is not the councils decision on the number of students taken, it is also n</p> <p><u>Question 4 Any further comments?</u></p> <p>This feels like students are being punished for something we didn't cause and further contributing to the demonisation of students. If people actually spoke to us they'd find most of us are actually reasonable, friendly humans just like them. Doing this before tackling the reason behind why so many HMO's are need and appearing is just going to change the problem and not solve it.</p>
Mr Tommy Parker	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No. Restricting housing like this is only going to make the housing situation in Bath worse. I am a young worker in Bath, and I was forced to move out of Bath into Peasedown because the cost of HMO's was too high, there wasnt enough availability, and it is impossible for me not to live in a HMO due to the cost of a 1 or 2 bed flat in Bath. This is only going to force more young people out of the city, make it impossible to retain graduates and push for a higher ageing population and make Bath even more unwelcoming to young people like me, and is yet another attack on young people from the council.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>No. See above</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No. See above</p> <p><u>Question 4 Any further comments?</u></p> <p>No</p>
<p>Mr Arron Mallinson- Pocock</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No, this new policy will be extremely damaging to the housing situation for the poorer people of Bath.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p>
<p>Mr Barry James</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p>

	<p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p><u>Question 4 Any further comments?</u> Students in HMO's should be paying council tax as they receive the same services as other residents.</p>
<p>Cllr Shaun Stephenson-McGall</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes; but we need to be more robust in the development of future planning policy around both Universities limiting, or even stopping, further expansion of academic space on their campuses and in the city.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes; very positive development</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes; very positive development</p> <p><u>Question 4 Any further comments?</u> I disagree with the response to 1.3 in the EIA / EA that this policy may mean HMO residents in new ares feel isolated if there is a lack of public transport and they lack personal transport. What is the evidence that we have public transport 'black spots' in the city of Bath? If we do however, how do they disproportionately effect HMO residents over other residents? 3.1 Bath is one of the safest cites in Britain and crime rates are very low; why would young people in HMOs feel unsafe travelling at night in say Newbridge rather than Oldfield Park? 3.4 Why are we more concerned about the 'isolation of young people forced to live outside current areas of high concentration ares such as Oldfield Park, rather than the current displacement of older people, single people, those with a disability or families with young children who</p>

	are displaced into peripheral areas of the city?
Westfield Parish Council	The consultation was noted and the Council asked that BANES keeps in mind other areas where over occupation takes place due to workers being over crowded into houses, and takes action when reported.
National Landlords Association	<p>Introduction</p> <ol style="list-style-type: none"> 1. The National Landlords Association (NLA) exists to protect and promote the interests of private residential landlords. 2. With more than 60,000 individual landlords from around the United Kingdom (UK) and over 100 local authority associates, we provide a comprehensive range of benefits and services to our members and strive to raise standards in the private rented sector. 3. We seek a fair legislative and regulatory environment for the private rented sector while aiming to ensure that landlords are aware of their statutory rights and responsibilities. <p>General comments</p> <ol style="list-style-type: none"> 4. We would like to thank Bath and North Somerset Council for including us in the consultation, but we would like to highlight some concerns regarding the direction made by the council under article 4(1) of the Town and Country Planning (General Permitted Development) Order 1995. 5. We believe that any additional regulation of the private rented sector should balance the desire to ensure secure and sustainable communities with the increasing need for good-quality housing. The introduction of an article 4 direction will have an impact on the housing market in Bath. This can be seen in Oxford, Nottingham and Southampton where the councils have introduced an article 4 direction reducing supply and increasing costs. The impact has seen rents increase and the most vulnerable pushed further to the margins of the private rented sector. 6. The introduction of such a policy has been good for existing landlords of properties that are rented out to shared tenants. The introduction of an article 4 direction has reduced competition and has meant that the value of their properties has increased. Equally , existing owners have seen the value of their houses decrease, as no investor would want to buy the properties. 7. In the city of Bath, two identical, neighbouring properties changed hands within a month of each other (Dartmouth Street, July 2015). The sale price of the house with shared-use status was £50,000 higher. The proposed policy will not convert properties back to family usage, but rather keep them in shared usage.

8. Additional regulatory burdens must focus on engaging with private landlords to improve professionalism, knowledge-based accreditation and, in turn, standards, while reducing opportunities for rogue landlords to blight the sector. It should be the shared objectives of all parties involved to facilitate the best possible outcomes for landlords and tenants.

9. An article 4 direction is undoubtedly a powerful tool for local authorities when used appropriately. However, it should be considered in areas where there is not a predominance of shared housing, rather than as an attempt to stop shared housing where it is predominant. In many areas, the use of

article 4 directions has had the opposite effect to the council's aims. For example, in Nottingham landlords will not rent out properties to families for fear of losing their Use Class C4 status.

10. We also question the timing of the introduction with the changes to welfare that creates a need for shared housing in both the private and social sector.

Use Class C4

11. It is our view that the introduction of Use Class C4, in relation to houses in multiple occupation (HMO) accommodation, is unnecessary and serves only to create greater confusion and bureaucracy for the private rented sector. The government's Planning Portal determines that:

'The purpose of the planning system is to ensure that development plans and planning applications contribute to the delivery of sustainable development. This means that the right development is in the right place and at the right time.'¹

12. This statement defines the rationale governing permitted development, which is an important tool for managing reasonable and justifiable development. However, it is our contention that the establishment of a small HMO (as defined by the recent regulations) does not represent a substantial change of use in terms of the burden imposed on local infrastructure. The usage of local services is unlikely to be greatly different for a property shared by three unrelated renters than a family with teenage dependents. This position is supported by the recent Lancashire planning appeal ref: 100-067-072, which stated:

'The continued use of an end of terrace house in Lancashire as a house in multiple occupation was allowed, an inspector reasoning that noise should be little different from that made by a typical family. The next-door neighbours referred to disturbance from televisions, people moving around the property and doors slamming, claiming that it extended well into the evening on occasion. However, the inspector

reasoned that in properties in family use many bedrooms occupied by children, and particularly teenagers, contained televisions and audio equipment. Thus, whilst tenants might be inconsiderate on occasion, the same could be said of any type of occupier. Moreover, she found no evidence to support the generalised assertion that occupiers of an HMO were intrinsically more disposed to coming and going in the late evening or early morning hours than occupiers of other property types. She acknowledged that some tenants could work on a shift basis or during night time hours but given the limited number of occupants she did not consider that the comings and goings would be materially different from that associated with a typical household.’²

13. Therefore, we do not agree with the justification put forward by Bath and North Somerset Council for introducing further demarcation into existing housing stock to control the legitimate use of property.

HMOs and shared housing

14. The trends in future UK housing demographics, along with the current state of housing finance and supply of affordable housing especially with the changes to welfare, point to a greater need for shared and HMO-type housing in and around the city of Bath. The flexibility and affordability that HMOs and shared housing provide are critical for many who either cannot afford or do not want the liabilities involved in owning their own home or indeed living on their own.

15. In addition to young professionals, migrants make up an important part of the shared housing market in the UK. For obvious economic reasons and for flexibility, shared housing is an important source of housing for these groups. However, demand is not static.

16. The characteristics of HMOs appeal to certain groups due to their transient nature. These households are not intended to ‘grow roots’ or stay in the same home for a generation. HMOs and shared housing are popular among certain socio-economic groups precisely because they provide a fluid housing option. To remove this housing provision will have a detrimental effect on the economic and social impact of communities.

17. We believe that the council also has not taken into consideration the impact of the introduction of Universal Credit. With the requirement of shared housing increasing, which this policy seeks to limit, there appears to be a lack of joined up policy in the council.

Antisocial behaviour

18. In common with all types of rented or leasehold tenure including social housing, the rights and responsibilities associated with a private rented tenancy lie with both the landlord and the tenant. As with any other household, those in shared housing are required to behave in a socially acceptable way. Where reality does not match these expectations, both the landlord and the local authority have powers to tackle

unacceptable behaviour.

19. Where a particular issue related to the concentration of shared housing has been identified, local authorities and enforcement agencies have extensive existing statutory powers to deal with such issues. We argue that these powers should be explored and exhausted before an article 4 direction is made. Such powers include issuing:

criminal behaviour orders

crime prevention injunctions

improvement notices (for homes that do not meet the Decent Homes Standard)

directions regarding the disposal of waste (e.g. section 46 of the Environmental Protection Act 1990)

litter abatement notices (section 92 of the Environmental Protection Act 1990)

fixed penalty notices or confiscation of equipment (sections 8 and 10 of the Noise Act 1996)

requests to remove rubbish from land (section 2(4) of the Prevention of Damage by Pests Act 1949).

20. The landlord has lesser powers. A landlord currently requires local residents or the council to identify particular cases of unacceptable behaviour and then notify them so that they can be dealt with. Landlords can neither continually monitor the behaviour of their tenants nor do anything that may constitute harassment. A landlord would have to build a case to take the tenant to court. This can take several months, while running the risk of damage to the property and/or conflict about who is the cause of the problem.

21. Too often, local residents fall into the fallacy that it is the house itself rather than the household that causes an issue. They build up a 'general feeling' about areas of particularly dense shared housing without looking to see whether particular problems have been dealt with. This aggregation of issues, particularly grievances and 'general feelings' about a community, can quickly make residents feel that a 'tipping point' has been reached. This problem is compounded where residents are not made aware of any specific action taken by a landlord or local authority against a particular household and so are ignorant of any work being done to tackle issues important to them. A council or landlord could be building a case against a tenant that takes time, while another resident wants immediate redress. The introduction of an article 4 direction will not alter this process' but would instead give false hope to many of the residents'?

22. Where some local authorities have come together with other community stakeholders, including local landlords, to tackle particular problems or issues, they have been successful.³ However, these initiatives require local authorities to actively engage with all community stakeholders, including the landlords.

	<p>Justification</p> <p>23. Bath and North Somerset Council faces a shortage of housing with high levels of demand across all tenures, including a considerable need for rented accommodation. As providers of private residential accommodation, landlords base their business plans on the existing population and expected future demand. They are well placed to react to changes in demand with greater flexibility than social housing providers. The introduction of an article 4 direction crystallises the current housing market. It will not convert housing back as advocated by many resident groups.</p> <p>24. The proposed article 4 direction is likely to erode the ability of landlords in and around Bath to react to changing circumstances and the needs of the local community by removing the general permissions currently available for development. This measure will act as a distorting influence on the housing market as property with implied HMO permission (used in the past as shared housing but not currently) will either be converted back to multiple use, or will no longer be regarded as a premium investment opportunity. The properties that have already been converted will be preserved as they will have a higher value, both for selling and for renting out, while those Use Class C4 properties unable to be converted under the new regime will decrease in value. This will increase isolation within certain communities.</p> <p>Conclusion</p> <p>25. The impact of the introduction of an article 4 direction can be seen in other areas of the UK. Its introduction has seen a fall in house prices and many home owners unable to sell their property. This has prevented new entries into the market and has increased costs for renters.</p> <p>26. In conclusion, we would not support the implementation of an article 4 direction in Bath as it is a planning policy that is being used to socially engineer communities. A lack of new houses being built has driven the need for shared housing. The introduction of an article 4 direction would prevent home owners getting the best value for their property and would increase the costs of renting.</p> <p>27. Again, we would like to thank Bath and North Somerset Council for the opportunity to respond to this consultation and we hope our comments are useful.</p>
<p>Bear Flat Association (BFA)</p>	<p>Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath?</p> <p>Yes.</p> <p>BFA supports the FoBRA contention that maintaining or achieving balanced communities is a fundamental consideration and therefore that Purpose Built Student Accommodation should be taken into account. The National Planning Policy Framework states that an objective for LPAs is to create balanced communities.</p>

	<p>Do you agree with the Sandwich Policy proposed in the draft SPD? Yes.</p> <p>Do you agree with lowering the HMO threshold to 10% from 25%? Yes.</p> <p>A community with 25% of HMO properties cannot be described as ‘balanced’ (see above). There has been a significant increase in concentrations of HMO properties in the last few years across Bath which would support a lower threshold. Even if the 10% figure is chosen, this should not prohibit a change to HMO if there were other, case-specific factors in favour of such a change of use. The effects of a lower threshold should be monitored and assessed. This step is sensible and necessary given the lack of a formal Student Housing Policy and the Universities’ failure to provide accommodation for more than a small minority of their students. The universities apparently have no intention of accommodating more than about a third of their full-time students in university-managed accommodation so students dependence on the private rented sector is set to continue.</p> <p>Any other comments? The size of Bath’s student population is a major factor in the scale of HMOs in the city. As the numbers of students in the city have risen over recent years, so the problems for some areas associated with concentrations of HMOs has worsened. As well as trying to minimise any over-concentrations, it could also be helpful to consider a more rounded approach to this issue. Oxford City, in its Core Strategy, has adopted a policy which seeks to try and restrict any future rise in student numbers looking for accommodation within the existing housing stock. Core Strategy policy CS25 seeks to ensure that any increases in student numbers as a result of increased academic/administrative floor-space is matched by a corresponding increase in purpose built student accommodation. Such a policy in Bath could help to ensure that any future rise in student numbers because of university expansion did not result in increased demand from students for accommodation in HMOs across the city. Such an approach could play its part in minimising the impact of students on the resident population.</p>
Lower Oldfield Park Residents Association	<p>Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath.</p> <p>We agree with the general approach to manage the concentration of HMOs, reducing the criteria to 10% instead of the current 25%.However if BANeS should also consider the number of student bed spaces in any one area where there is Purpose Built Student Accommodation (PBSA) blocks which also significantly stifle the SPD’s stated aim of achieving balanced communities. e.g.The application(now at appeal) for redevelopment of Wansdyke Business Centre in Oldfield Park where it has been controversially proposed to build a PBSA block in an area</p>

with an already high concentration of HMOs.

2. Do you agree with the Sandwich Policy proposed in the draft SPD?

Yes we agree with this proposal.

3. Do you agree with lowering the HMO threshold to 10% from 25%?

Yes we agree with this proposal.

We would also advocate that if this proposal is adopted, and we understand that this is not retrospective, that in an area that will exceed the 10% rule, that any HMO that changes ownership should have to reapply for HMO permission, and that this would be considered in respect of any new rules restricting HMOs to 10%

The National Planning Policy Framework (NPPF) states that an objective for LPAs is to create balanced communities. We strongly believes this situation to have been caused by the lack of a formal Student Housing Policy which has resulted in the Universities providing accommodation for only a small minority of their students.

The National HMO Lobby, in its publication 'Balanced Communities and Studentification – Problems and Solutions' (<http://hmolobby.org.uk/39articles.pdf>) defines (on p.7) a 'Tipping Point' as the threshold beyond which balanced communities become unbalanced, based on comprehensive research. The NHMOL defines the tipping point in a given location as the point at which either:

- the number of HMOs exceeds 10% of properties; or
- the number of HMO occupants exceeds 20% of the population.

A community in which a quarter of properties are HMOs cannot be described as 'balanced' and agrees with NHMOL that a 10% threshold is more appropriate; indeed necessary, particularly for university towns/cities, like Bath, where students form a high proportion of the population.

	<p>We consider that there is revised local evidence which supports the view that the student population in Bath has grown to 25% to be another reason why the HMO property threshold should be significantly reduced.</p> <p>The Universities have demonstrated during the BANES Placemaking Plan process that they have no intention of accommodating more than about a third of their full-time students in university-managed accommodation. With the vast majority of Bath's students already dependent on the private rented sector for their accommodation, the demand for HMOs and Purpose Built Student Accommodation (PBSA) will therefore only continue to increase over the coming years. Potential 'studentification' (with its attendant imbalance of communities) of even wider areas of the city should therefore be more tightly controlled than hitherto by urgently reducing the HMO property threshold to 10%.</p> <p>4. Any other comments?</p> <p>We understand the need for HMOs but BANES must control the amount to which these are generally occupied by students with the nett result of over studentification of areas of Bath. The lowering of the threshold to 10% instead of the current 25% will go some way to provide more balanced communities. It will be very difficult to redress the harm that has already taken place in parts of Oldfield Park and Twerton, but a 20% of population limit which includes purpose built Student accommodation would be a step in the right direction. The two Universities in bath have enough space to provide more on site accommodation for their increasing number of students.</p>
<p>Spencer Mildon (of Action Accommodation Ltd, Action Lettings Ltd and Nimble Property Management Ltd)</p>	<p>Dear HMO SPD Review Team,</p> <p>Firstly, I would like to apologise for the last-minute timing of my comments - I've had an incredibly busy past few months.</p> <p>Secondly, I would like to praise the success of the HMO licensing function operated in Bath. I firmly believe it has raised the quality of rented housing across the city in various ways, setting a higher floor and creating further 'positive externalities' that I will expand on below.</p> <p>My comments are based largely upon my review of the Bath SPD Review by Ove Arup & Partners, overlaid with my direct experience and that of my mother's (Angela Mildon), operating as landlords for 15 years in Bath (mainly to students but professionals also).</p> <p>I commend Arup's review for its quantitative and spatial assessment of the situation and for detailing pros and cons of the various options analysed for many stakeholders. However, I feel two key areas should be given more attention:</p> <ol style="list-style-type: none"> 1. Pricing; 2. Behaviour.

I would then finally like to comment on:

3. Density threshold levels.

1. Pricing

I recognise there are numerous reasons to prefer dedicated, purpose-built blocks of student accommodation to meet the bed space growth needs of the two universities over the coming decade. However, we have seen time and again that these new developments deliver rooms offered at a significant price premium. Any owner of such a large development already has significant pricing power but this is then compounded by the imposed restrictions on cheaper housing in the private rental sector (small landlords) encouraging prices to rise in all sectors and areas.

As an example, The Depot at the bottom of Brougham Hayes has its cheapest offering at £210 per week, rising to £261 per week at the top end:

<http://freshstudentliving.co.uk/property/the-depot/rooms>

Yes, this might be fabulous for wealthy students (often those from overseas) but Angela and I see many many students for whom this is way out of budget and hear lots of stories of students being forced to sleep on friends' sofas or even lecturers' floors.

Rooms in the private sector are more typically £80-100 per week - with a wide variation around that depending on quality - but are generally far more affordable. That said, such is the demand for these rooms (and ours included) that their prices are starting to rise, simply because they can. A dynamic which I firmly believe has been accentuated by the reliance on new purpose-built blocks to fill the supply gap after the restrictions on the private sector.

2. Behaviour

I stated above that the Arup report was strong in a quantitative sense. However, I would like to have seen more analysis in a qualitative sense. Less so in terms of the quality of offered housing but more so in terms of the quality of tenants (largely students) and their behaviour.

Our experience operating in this area over the past 15 years suggests complaints from other (non-HMO) residents centre more around the quality of HMO tenants rather than their quantity. Obviously, if the quality is low then it helps to keep the quantity low too. However, I

believe that a higher quality would allow for higher quantity without upsetting the community balance so much.

As intimated above, I believe the nature of HMO licensing requirements has helped in this regard by firstly raising the quality of housing but also increasing responsibility and engagement of both landlords and tenants, particularly with the requirement for each tenant to sign Appendix 2 of the HMO Licence. Other items, such as BANES Council's recycling push have positively compounded this trend.

I believe further measures in this direction could continue to enhance levels of respect and cohesion in local communities, including those with high HMO concentrations.

3. Density threshold levels

In my first point above I argued that tight restrictions on the private rented sector have had (and will have) a detrimental impact on rental pricing. In my second point I argued that positive measures on behaviour might reduce the problems associated with higher HMO concentrations without having to restrict/reduce that concentration.

A further point that was lightly touched on in Arup's report was the suitability and desirability of locations across the city. As is well understood, bus routes, distance to universities and shops, access to the city centre, proximity to other friends and various other factors all feature in where tenants wish to live. (We see this clearly when the same few houses are always last to be taken each year.) Naturally this puts further practical limitations on where HMO expansions can realistically take place, particularly in the short term.

Given this and the following points, I think lowering the density threshold to 10% will be too severe and potentially unnecessary:

- There are various development restrictions on many parts of the city for numerous reasons.
- The current regulatory regime and its calibration appears to be working well, as evidenced by the persistence of the dynamic I described in my first point above (supply being tight and prices rising).
- The new sandwich policy will likely be quite limiting in itself - it means for every one HMO created, two other potential properties will then be blocked, which really might start limiting options when considering that turnover of 'eligible' potential HMO supply can be very slow.
- If Bath has ~2,500 HMOs now, reaching ~3,000 in three years (as per demand projections in the report) would seem tough enough with a 25% threshold, let alone anything lower. Given the stated regulatory and practical frictions in the market, this feels to me like a real struggle to meet.

Overall, my preference would be to retain the 25% density threshold, which I believe is working well and strikes a better balance of

preserving community integrity while also facilitating Bath's sustainable growth plans. The Belfast option of multiple thresholds holds some appeal but would likely be confusing and add more administrative burden.

Where I think change could be most impactful would be in continued education and regulation around behaviour and responsibility for/from tenants/students, landlords, BANES, the universities themselves and any other stakeholders. A wide range of carrots and sticks could be employed.

I do not wish to sound critical or negative. I genuinely support a lot of the mechanisms and tools that have been introduced to try to improve this situation. I also reiterate that many aspects of the Arup report addressed the topic well. However, I do find it a little narrow in places and can't help feeling that it was possibly shaped to fit the stated Bath Spatial Strategy "to enable the provision for additional on-campus student bedspaces at the two Bath universities and new off-campus student accommodation subject to Policy B5, thereby facilitating growth in the overall number of students whilst avoiding growth of the student lettings market". In other words, to favour purpose-built, large accommodation blocks at the expense of small houses provided by private landlords.

Thank you in advance for your kind consideration of my comments, and for providing such an open and transparent consultation process. To follow up with some specific suggestions to improve behaviour, I would recommend the following:

1. A series of statements and/or guidance notes on the Studentpad.co.uk platform that students have to acknowledge and sign up to electronically when registering each year. Ideally in a concise bullet-point form where they must physically tick check-boxes to confirm each point has been read.
2. More focus from the university on incentivising better, more responsible behaviour during tenure in university-managed halls, and also on providing more information to better equip students when they progress from there into the private rental sector and the wider community of Bath.
3. Encourage landlords to share contact details and engage with neighbouring residents such that a direct channel exists for those neighbours to raise any issues and voice any concerns. Faced with the only option of reporting frustrations to the council, I'm sure many suffer in silence, and the associated feeling of powerlessness likely compounds their pain.
4. Encourage landlords to introduce new tenants to their neighbours (where practicable) and to generally promote a sense of community, responsibility and engagement within their groups of tenants.

These recommendations might sound like an unnecessarily 'nanny-state' type of approach. However, we receive many tenants after spending

	<p>18 years living at home with parents followed a year in halls on campus (which can often be a quite negative preparation for mature life beyond) and arrive without having any idea of items such as:</p> <ul style="list-style-type: none"> - settings up utility contracts, reading meters and paying bills - understanding what waste to put down sinks and what to put in bins - opening windows to release moisture and prevent build up of mould - storage and regular removal of rubbish, and at the correct times - the negative consequences of putting out rubbish at the wrong times and/or in wrong places - separation of recycling - the impact of noise - an appreciation for the typical working adult's schedule, particularly bed times <p>...and, in some cases, having no knowledge on:</p> <ul style="list-style-type: none"> - changing fuses - replacing light bulbs - adjusting radiator thermostats - using an oven <p>...and I could go on.</p> <p>Things are definitely improving, and BANES Council has played a positive hand in this already. However, I reiterate that I see more potential for further improvement in community cohesion through better behaviour of HMO residents rather than increased restriction of numbers.</p> <p>Incidentally, as a side note, another observation from my experience, particularly in Twerton, is the poor behaviour of the local youth that is not a consequence of high HMO/student concentration and I would imagine that these young individuals get conflated with young students and HMOs.</p> <p>Finally, I just wanted to make the point that I am not airing views to merely support my own financial interests. I am trying to be objective, unbiased and constructive. I would much rather have happy tenants and happy neighbours than having higher rent because increased restrictions have pushed prices up but without solving what I believe to be the more genuine root causes of the issues.</p>
<p>Dr Nicky Kemp University of Bath Spa</p>	<p>1. The University is conscious of the significant financial commitment that our students are making when registering to study. We support approaches to accommodation within the City that deliver the greatest choice for our students in terms of the type and the cost of accommodation available to them. In this context, we recognise the importance of HMOs in terms of their flexibility</p>

and affordability. Given the present uncertainties around the national strategy for the future funding of Higher Education, we believe that choice will be an important consideration for students for the foreseeable future.

2. The University is the second largest employer in Bath & North East Somerset (B&NES). In 2014/15, we directly employed 3,031 people, or one in every 33 people in employment in B&NES. In 2014/15, over half of our staff lived in B&NES and another 36 percent lived in the wider South West region. They were paid £98.2 million in gross wages, generating a £19.9 million contribution to the B&NES GDP. As an employer, we support approaches that recognise the significance of the capacity of the HMO provision to local employers' ability to attract and retain early career professionals, to accommodate individuals establishing themselves in the area and to provide flexibility for the whole workforce. It is not just students who benefit from HMOs.
3. The scale and success of the University's research and teaching activities create a significant economic impact in B&NES, and beyond. In 2016, we commissioned Oxford Economics, an independent company, to analyse some of the economic contributions that we make. Our total impact on the local economy was valued at £294 million in 2014/15, or 6.2 percent of the total GDP for B&NES. Of this, it is estimated that we directly and indirectly supported two thirds (£188.2 million) of the total contribution to GDP, while spending by our students and their visitors stimulated the remainder (£105.8 million). Our direct contribution of £166.6 million represented 3.5 percent of the B&NES GDP. £1.6 million was generated by the procurement of goods and services from over 310 suppliers within B&NES.
4. Spending by our students on rent, local transport, food and drink, household goods and other items amounted to £104 million of the total, and supported some 2,320 people in employment in B&NES, in addition to University employees. It is estimated that some £9,560 in extra value added is supported in B&NES by each additional student that the University recruits.
5. The student community also adds value to civic life through their volunteering and fundraising activities. Last year, our Students' Union's V team contributed around 6,500 hours of volunteering in the local area, supporting various projects, and its Raise And Give (RAG) group raised approximately £125,000 for local charities.

We are sensitive to the concerns of B&NES residents in areas with high HMO densities and will continue to work with our Students' Union, with the Student Community Partnership and with other organisations to mitigate negative impacts. We see Purpose Built Student

	<p>Accommodation (PBSA) as being a valuable alternative option to HMO provision, allowing student communities to develop with less impact on local residents. We would welcome the development of further well-serviced, affordable PBSAs, particularly those sited in areas which would enable student communities to flourish.</p>
<p>Bath and North East Somerset Liberal Democrats Group</p>	<p>Question 1: Do you agree with the general approach of the SPD to manage the concentration of HMOs in parts in Bath? Yes, we are pleased that the SPD is being reviewed and believe that the Council is right to continue to manage the concentration of Houses in Multiple Occupation in the City in this way.</p> <p>Question 2: Do you agree with the Sandwich Policy proposed in the draft SPD? Yes, residents tell us of the social isolation that can occur when both immediate neighbouring properties are in Multiple Occupation. Additionally we are content that this policy will help distribute and dilute HMOs across the City.</p> <p>Question 3: Do you agree with lowering the HMO threshold to 10% from 25%? Yes, lowering the HMO threshold from 25% will enable better distribution of HMOs across the City; and prevent over-concentration of HMOs in new areas.</p> <p>Question 4: Any other comments? We would urge the Council to consider whether a SPD should be introduced to manage the concentration of HMOs in other urban areas of the District, such as Peasdown St. John, Radstock and Midsomer Norton</p>
<p>India Cocking</p>	<p>I would like to strongly urge you to consider the harm that Article 4 could do to areas like Bath and to drop this proposed action which we at the RLA feel could do serious harm to the town.</p> <p>These restrictions do nothing to reverse the negative impact shared houses can have on an area, if anything they put areas without a HMO population at higher risk as new HMOs will be on the lookout for new areas. You may prevent more from emerging but existing ones will still remain as frozen communities - no closer to reverting to family areas than they are now.</p> <p>Instead, the future lays with other solutions such as improving housing relationships with local universities and colleges and by using</p>

accreditation schemes to raise the quality and professionalism of local approved private sector landlords.

Because, underlying all this, is your council's responsibility to provide good quality rented housing for local people whose income level or chosen lifestyle rely on a plentiful supply of affordable, and often shared, housing.

Particularly the student community – many of whom chose to stay on in Bath after graduation, to begin their career with local business, and need a low-cost housing option until they have cleared the heavy debt of their education.

Low income earners, too, for whom renting is the only choice. And those with prospects but are struggling, short term, to buy their first property.

These people rely on your authority to provide the services they need. That's why Article 4 would not help the area. Quite the contrary. There are dangers and threats that suggest you are attempting to use the wrong law to solve what you perceive as a problem.

Local authorities are under a duty to meet demand for housing. A key issue is the increase in demand from the Under 35 age group who need access to shared housing because: they choose to; of the benefit cap and extension of the Shared Accommodation Rate from 25 – 35; they are priced out of buying a home; or, they are still on a social housing waiting list. We suspect that these issues do affect Bath as they are symptomatic of such high demand and lack of supply of housing which is occurring nationwide.

The APPG (All Party Parliamentary Group) on the PRS, report recommended that Local Authorities should be allowed to use "flipping". Flipping would mean once a landlord had received permission for a building to be used as a HMO it would be in force indefinitely enabling them to flip the use of the property from HMO to family use and back to HMO again, if they so wish. This would avoid the situation faced in some areas whereby HMOs remain empty because landlords do not want to have to go through the planning application process if they decide to let the property to a family.

It also suggested that legislation designed to tackle anti-social behaviour is properly enforced, rather than simply reaching for planning powers to start with. We feel that where occupants of shared housing cause repeated trouble and fail to respond to warnings about their behaviour, universities, student's unions, landlords and the local police should ensure that robust action is taken against such tenants, with a much swifter process to evict them where need be.

With the current cutbacks facing local authorities is this something which a local planning authority should be focusing on at all? You make no mention of cost in your supporting documents. This leaves many questions such as will Bath have the resources for a full Borough wide scheme and deal with the consequent planning applications? How will this cost be met?

Shouldn't local resources be better utilised, for example to actually deal with problems as they arise with better tenant education on refuse collection and more effective enforcement. This could include better enforcement of the complaints. There is the argument that those Landlords who just 'flip' the use of dwellings without consent already, will just continue to do so unless there is effective enforcement and proactive inspections to see that HMOs have sought the necessary permissions.

If the local authority believe they have a problem with tenant behaviour or the management of properties in Bath there are other ways of dealing with this than by changing planning laws.

We recognise an inherent danger in creating 'no-go HMO zones' where the abhorrent spectre of social engineering would seek to deny sections of society the freedom to live where they choose.

Landlords need flexibility to provide a service that Bath people need and which Article 4 would deny them. Flexibility to switch between letting to groups of sharing tenants or families, according to demand, without the need for planning permission each time.

We urge the council not to make it impossible, or even more difficult than it is, for private sector landlords to provide affordable homes. Especially in these difficult economic times when most people need all the help they can get.

Conclusion

The RLA reiterates its objection to the proposed scheme.

We strongly believe that in the first instance, before even contemplating removing development rights, the local authority should look for a more imaginative solution.

What is really needed, as mentioned previously, is some improved area management for the problems that you at the moment are merely anticipating. Once you have established where the problem is through effective local data, street by street property inspections can be

	<p>carried out. HHSRS powers can be used to effect improvements, if voluntary co-operation will not work.</p> <p>Rather than implementing an Article 4 Direction, time would be far better spent “out on the street” looking at properties and making sure that any that are needed are brought up to standard.</p> <p>Landlord accreditation can also be used to ensure that HMO management is of a high standard. These and other measures have an immediate impact and address the current position whereas the Article 4 direction may only prevent new HMOs.</p> <p>Again, if these planning restrictions are to go ahead we would recommend that Local Authorities like Bath should be allowed to use “flipping”, if demand changed in the Borough and more HMO accommodation is needed. As we explain earlier in this document this would avoid the situation faced in some areas whereby HMOs remain empty because landlords do not want to have to go through the planning application process again if they decide to let the property to a family.</p>
<p>CBRE Planning On behalf of, Bath Spa University (‘BSU’)</p>	<p>On behalf of, Bath Spa University (‘BSU’), CBRE Planning is instructed to submit representations to the Houses in Multiple Occupation (‘HMO’) Supplementary Planning Document (‘SPD’). This is following our representations to the informal options consultation which took place in May 2017 (found at Enclosure 1). The previous round of consultation presented a range of options that could be adopted by the SPD to support Policy H2 (Houses in Multiple Occupation) of the recently adopted Placemaking Plan. This response has been coordinated alongside the BSU Student Union in recognition of the impact this document will have on BSU Students in the City of Bath and the importance of considering a range of viewpoints.</p> <p>As per our previous representations, BSU acknowledges that whilst HMOs are an important part of housing land supply for not only student accommodation within the City but also young professionals and key workers, the relationship between HMOs and the communities in which they are located can be delicate, and therefore the provision and control of HMOs is a strategic issue for B&NES. However, HMOs in the City of Bath provide an important role in supporting specific housing needs including students, young professionals and key workers, and therefore it is important that B&NES provide an appropriate policy response.</p> <p>Please note that BSU has previously made representations to the informal HMO SPD Consultation, and a copy of the relevant correspondence is appended.</p> <p>CONTEXT</p> <p>We understand the purpose of the review is to allow B&NES to evaluate the success of the current SPD which was adopted three years ago, in order to provide criteria for assessing planning applications for the change of use from family homes (Use Class C3) to HMOs (Use Class C4)</p>

following the withdrawal of the permitted development right in the City Centre Boundary. The review has been undertaken in the context of the existing HMO SPD which sets out a two-stage process to assessing HMO applications.

To support the options consultation, ARUP provided a number of options for B&NES to consider in the review that may be suitable to take forward in the revised SPD. These were informed by forecasts in the increase of student numbers from both BSU and the University of Bath and the amount of accommodation currently available. As detailed in this report, the projected growth in student numbers from both Universities is expected to outstrip the existing supply of purpose built accommodation and HMOs in the next five years. With the policies for purpose built student accommodation not being considered until the Local Plan Review and purpose built accommodation having a long lead in period and build time, HMOs represent an important component of the student housing market which is relevant to the sustainable growth aspirations of BSU.

REPRESENTATIONS

General comments

As set out previously, BSU is supportive of the consideration of purpose built student accommodation being deferred to the new Local Plan as this is a different model of student accommodation to HMOs and therefore a 'one-size fits all' SPD for student accommodation would not be appropriate. It should be noted in relation to this that the different forms of student accommodation are interrelated; a restriction on the provision of purpose built student accommodation as well as added restrictions on HMOs could present a supply challenge. In order to facilitate the necessary growth, all forms of student accommodation need to be supported in balance to avoid significant supply issues which could likely exacerbate HMO issues.

The Planning Practice Guidance requires that local authorities should plan for sufficient student accommodation of different types, including halls of residence and self-contained dwellings on and off campus; consider how the provision of more dedicated student accommodation may impact on the wider private rental sector and engage with universities to better understand their requirements. Furthermore, the requirement to plan for different types of residential need, including student accommodation is set out in the recent DCLG consultation 'Planning for the right homes in the right places: consultation proposals', and therefore should be taken on board when setting the housing targets at a strategic level through the Joint Spatial Plan and the Local Plan review.

To accommodate the sustainable and planned growth aspirations of BSU (within a range of 4-7% compound growth from 2015/16 to 2020/21), additional academic floorspace and student bedspaces need to be provided. This intention has been consistently set out in BSU's representations to the Placemaking Plan and the emerging Local Plan. BSU prefers to accommodate its growth through purpose built student accommodation either on-campus or off-campus to ensure better quality and management for the benefit of its students and the surrounding communities. They recognise the importance that HMOs play in the overall provision and providing students and those recently graduated an alternative source of accommodation to suit their needs. BSU would wish to see that future PBSA is restricted to development

of cluster flats that would more closely compete with HMOs in offer and hopefully cost and this is something that can be picked up in the future Local Plan consultation.

BSU currently provides 2,264 bed spaces. Assuming that c. 55% of students will continue to require accommodation, some 2,600-2,900 bed spaces in total (ie. an additional 336 – 636) will be required by 2020/21. These figures are based on the latest information available to BSU and may be subject to change throughout the plan making process. BSU has not been provided with any comprehensive figures regarding the proportion of students residing in HMOs specifically relating to its own students; and whilst Arup's report sets out that this is c. 57% across both Universities, the student demographic is varied across both Universities and therefore a single percentage across both institutions does not provide an accurate reflection.

The University is aware of a small number (circa 50) of students who have approached BSU's Housing Department to request second and/or third year university accommodation but the reasons behind these requests may not all be down to a shortage of space in the private sector. However, there is the view amongst the entire student body in the city is that there is a shortage of accommodation, but it is unclear if this is substantiated in reality.

Response to consultation questions

Question 1 – Do you agree with the general approach of the SPD to manage the concentration of HMOs in parts in Bath?

Looking at Arup's document, it is noted that since the Article 4 direction being adopted in 2014, 142 planning applications for HMOs have been submitted, 134 of which have been granted and 8 of which have been refused. This shows a steady increase of c. 5% of HMOs, which has just met demand from both Universities.

Therefore, BSU considers that the SPD as existing has been successful in preventing large agglomerations of student HMOs in areas where this may be a concern. The existing 25% provides a good balance between the competing needs of residents and students, that it has had a minimal impact on the rental market in Bath and that it has helped to contribute to the creation of mixed and balanced communities in Bath. The changes proposed to the SPD in lowering the threshold to 10% concentration of HMOs in census output areas unduly restricts the provision of HMOs. Although BSU prefers to house students in purpose built accommodation, there is still some residual demand from students for HMOs in sustainably located places close to the University campus and the city centre. A further reduction on the concentration of HMOs is not opposed in principle, but BSU has concerns that an increase in restrictions on HMOs, without support or a strategy to secure other forms of affordable student and young professional/key worker accommodation will have consequences for maintaining supply in the City and allowing wider economic and academic growth realisation. Therefore, BSU would welcome the opportunity to work with B&NES to develop a sustainable approach and solution to this in the medium term to allow the future management of HMOs.

Question 2 – Do you agree with the Sandwich Policy proposed in the Draft SPD?

As per our previous representations, we consider that this could have the effect of being unduly restrictive to HMOs. A threshold policy is more effective as it takes into account the mix of the whole area, rather than the mix within the immediate surroundings. The

	<p>appropriateness of the use in terms of the impact on the surroundings can be considered through the planning application itself including the consideration of the loss of privacy and noise intrusion without the need for the sandwich policy approach.</p> <p>Question 3 – Do you agree with lowering the HMO threshold to 10% from 25%?</p> <p>We believe that the 10% threshold is, at present, unduly restrictive on the provision of HMOs and that the 25% threshold should be maintained in the short to medium term. There may be scope in the longer term for a threshold percentage reduction if sufficient purpose built student accommodation becomes available at prices that compete favourably with the private rented sector, following the review of purpose built accommodation through the Local Plan Review. In addition, HMOs provide an important housing tenure to graduates who have recently left the University and wish to remain in Bath as well as key workers and other groups who cannot currently afford home ownership. Therefore, ensuring that there is sufficient HMOs to meet not only student demand, but demand from other sources is important to securing graduate retention and retaining Bath’s competitiveness as a city.</p> <p>SUMMARY</p> <p>To summarise, BSU is supportive of the consideration of purpose built student accommodation being deferred to the Local Plan Review. However, with regards to HMOs, BSU considers that further restrictions could have impacts on the general housing supply for multiple groups across the City of Bath. Therefore, BSU would welcome the opportunity to work with B&NES going forward to work on the most appropriate strategy for accommodating University needs in balance with the needs of the City of Bath.</p>
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<p>Miss Erika Button</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes, management is desperately needed and much overdue. Damage has been done to communities. Many areas look a mess. Can anything be done to reverse the HMO's?</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes. I definitely think this will be a good implementation to stop permanent residents becoming isolated from communities. In fact, maybe there should be 2 houses or more between hmo's.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p>
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	<p>Yes, 10% or lower. My parents live in Oldfield Park still and I grew up there. Where they live is like a ghost town in university holiday time. No problems with parking. HMO's all filled up again...no parking, noisy, rubbish everywhere. It's such a shame</p> <p><u>Question 4 Any further comments?</u></p> <p>I'm glad these changes are proposed. Of course, they are so so late in coming. Hopefully there'll still be a few homes left in Oldfield Park.</p>
<p>Ms Andrea Robinson</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes. I agree with the sandwich policy, the lowering of the threshold to 10% and the introduction of the rules regarding the census output area. These are all very welcome and long-overdue measures.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes. Agree 100%.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes. Agree 100%.</p> <p><u>Question 4 Any further comments?</u></p> <p>A distinction should be made between student HMOs and those that house longer-term Bath residents/workers. The problems associated with student HMOs do not necessarily apply to the latter type, although the general shortage of family housing in Bath also needs to be addressed as a separate issue.</p>
<p>Mr Rob Oldfield</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Generally yes, but I think that it risks the number of purpose built student blocks increasing dramatically. The root of the problem is that the universities now have unlimited scope to increase student numbers and they show every sign of doing all they can to make full use of that. In</p>

	<p>that situation, purpose built blocks are I believe a way of sidestepping the current article 4 rules. Steps to address this issue need to be taken sooner rather than later after we are swamped with them.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes.</p> <p><u>Question 4 Any further comments?</u></p> <p>It would be useful if student HMOs could be differentiated from non student ones. Not sure how practical this is, but Bath does need to provide accommodation to people starting their working lives. Lobbying the government to reintroduce a cap on student numbers would also be sensible I think.</p>
Mr & Miss J & A Phillips	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>We agree to an extent. The approach taken here is a step in the right direction but it relates purely to the conversion to new HMOs only and is not addressing the related issue of student numbers. Restricting the number of HMOs will hopefully assist families to return to the city.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Most definitely. As we have lived in a ‘sandwich’ for the past 10 years or so we can tell you that it has ruined our quality of life and caused considerable stress and anxiety. Only one year out of those 10 years have we had good student neighbours on o</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes, though would prefer a further reduction to 0%. Only in doing this will the universities be forced to take their responsibilities seriously.</p>

	<p>The universities are multi million businesses who earn their money from the ruination of the city for reside</p> <p><u>Question 4 Any further comments?</u></p> <p>This SPD does not go far enough. Although it seeks to control HMOs, what it should also be doing is controlling the student numbers in each property.</p> <p>We live in Coronation Avenue in Oldfield Park. The street has been in the HMO Density Census Area from the beginning (currently about 50%) and no conversions to HMOs should be taking place.</p> <p>However, since this control was introduced, and certainly recently, in this immediate area the number of extensions, loft conversions, garage conversions, etc has ballooned where landlords are seeking to increase their income in a different way in the absence of being able to create more HMOs to add to their portfolios.</p> <p>The number of students in an HMO needs to be taken into account. Generally these terraced houses will take 4 students (or family). With the subdivision of rooms, loft conversions, extensions and garage conversions the number of students in each property can almost be doubled. This is gross overdevelopment and has the equivalent impact of new HMOs being created. The increase in numbers drastically increases noise issues internally in particular but also rubbish and parking problems. As part of this amendment to the SPD permitted development rights for HMOs for such works should be removed and planning permission required to increase the number of tenants. Only this way can the numbers of students be controlled in areas such as this.</p> <p>There is a new tactic which has reared its head and that is the student owner/occupier with lodgers which we understand does not fall under the HMO classification. Regardless a house with an owner/occupier and two lodgers and an HMO with 3 students can all create the same anti social problems and reduce the housing stock for families. We believe this also needs to be brought under control.</p> <p>It is very disappointing that student block and cluster flat developments are not included in this SPD. They too need to be controlled. It is rare for such blocks to be refused planning permission and this is leading to large jumps in student numbers in the very areas where this SPD is seeking to control HMO numbers. Although it is frequently claimed that such blocks release HMOs back to family use, in reality this does not happen. There are now developers who are clearly scouring the area (especially Oldfield Park) for such sites. The Wansdyke Business Park, the former Hygienic Laundry (Unit 2, Lymore Gardens), the Rising Sun (Lymore Avenue) and the Belvoir Pub are all such developments. All are sited in the Oldfield Park area where the highest concentrations of students are already. Nothing is being created for ordinary families and couples.</p>
Mr Richard Dixon	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree</u></p>

	<p><u>with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>The equality assessment is banal, without a proper assessment over a wider stakeholder group. The consultation is limited and should have included the total rental sector including Airbnb, full house rentals (family), social rentals and flats to ensure that it is inclusive and the right planning restrictions are established. There is no logic to not extending the additional licencing, it either applies to ensure minimum standards for all or is scrapped. The equality assessment should have looked at this.</p>
Mrs Ann Godfrey	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p>

	<p>if not 15%</p> <p><u>Question 4 Any further comments?</u></p> <p>Need extra 'sieve' to ensure that family houses (2bed & more) within child walking distance of primary & established nursery schools do not slip out of family use - in interests of community cohesion & traffic minimisation.</p>
<p>Captain Christopher Brann</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>This is a good policy 10 years to late. I am already sandwiched and parking is always, during term time, very difficult. What happens when I want to sell my house? It is bounded by HMO's and is likely to have more facing it soon as the warehouse opposite is converted. As I said a good policy but much to late for many people.</p>
<p>Miss Pauline Woods</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>YES.</p>

	<p>However, I definitely think that this statement should refer to ALL parts of Bath and not just parts of Bath as stated above.</p> <p>The sheer number of HMO's in Bath have distorted the housing market, a result of which means, that there are no traditional low cost family housing areas in Bath, as they have all been converted to HMO's</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>YES</p> <p>This will prevent entire roads, which are made up of houses, originally suited for first time buyers, young professionals and young families, from being converted into HMO's. This is the present situation in Triangle North. Also there is a similar s</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>YES - 100%</p> <p>It has been reported that there has been a 60% increase in HMO's in Bath since 2010. This makes Bath one of the smallest University Cities, with one of the highest proportion of student housing in the Country.</p> <p><u>Question 4 Any further comments?</u></p> <p>Bath has become oversaturated with students living in HMO's causing a social imbalance to the community. I live in Oldfield Park, where 25% of the houses are HMO's and this has completely changed the demographic of the area. I am concerned that the planning department are still allowing houses to be changed from residential to HMO's irrespective of the fact that the Article 4 Direction is in place. There is also a need to stop any more PBSA's being built in Bath. The planning department seem only interested in the impact, that the design of the building submitted, is going to make on the area and NOT looking at the detrimental impact these PBSA's are having on the residents who actually live in the area.</p>
Mr Ben Palmer	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p>

The SU Bath disagrees with the general approach of the SPD.

Firstly, the introduction of Article 4 has led HMOs to appear in areas such as Twerton, and these simply are not as accessible to students. As HMOs are appearing more widely across the city, and will continue to do so, The SU is concerned about the implication on Bath's transport links; we would like to know if there is an accompanying strategy for improving transport links following the implementation of this policy.

Secondly, making the concentration threshold lower will not solve residents' issues with HMO dwellings. This approach seems like an attempt to appease permanent residents' grievances with students but these grievances will not be resolved by changing a threshold. HMOs and student houses will still exist in current numbers in places like Oldfield Park and although this approach may cease additional HMOs being created, it does not deal with the essence of the issue. Moreover, The SU acknowledges that some HMO properties occasionally display anti-social behaviour but the way to deal with this is to put more onus on landlords, as well as working with The Student Community Partnership to work on problems constructively, instead of this knee-jerk policy. Furthermore, issues with some properties are unfairly blamed on students when in many cases there is little evidence to suggest it is the existence of students which causes these issues. For example, the lack of council tax in areas with high concentrations of HMOs may also be a contributing factor- perhaps landlords need to be charged business rates to help maintain civil standards.

Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?

The SU Bath disagrees with the Sandwich policy in the draft SPD. It is an additional method to reduce 'studentification'. Although The SU does recognise the potential issues of living between two HMOs. We are unable to support the idea and maintain that t

Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?

At The SU Bath, we strongly believe that the threshold should be maintained at 25%. Lowering the threshold only serves to reduce the amount of affordable accommodation available to students in Bath. If this 10% threshold is enacted, it will limit further

Question 4 Any further comments?

Considering the vast contributions students and the universities bring to Bath, it is difficult to see such disdain for students. In terms of the economy, The University of Bath alone contributes around £300 million to Bath & North East Somerset each year, which is

	<p>6.3% of the region's total economic output. Individually, each additional student adds another £9,500 of economic benefit to the area. Not to mention the amount of jobs the universities bring to Bath; The University of Bath is the second biggest employer in B&NES after the Royal United Hospital; providing around 5,850 jobs.</p> <p>Students individually also contribute widely to the area. Last year The SU Bath's Raise And Give (RAG) group raised approximately £125,000 for local charities. Additionally, The SU's V TEAM contributed around 6,500 hours of volunteering in the local area on various projects. This is in addition to our many other student groups and facilities that the people of Bath benefit from.</p>
Mr Will Sandry	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>No</p>
Mr Samuel Farr	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>Bath is a city which for the majority of the year is populated by students from multiple colleges and universities. Therefore it is completely outrageous to suggest plans to limit the amount of available accommodation to them (which is already stupendously overpriced and very low quality). The housing market needs to be made MORE accessible for students, not less. It is unsurprising that a Conservative-led council is suggesting these austerity-drenched ideas that serve to only penalise the younger residents of this city who face impossibly high rent and very little prospect of making it onto the property ladder at all. More should be done to reduce rental rates and tackle the problem of unfair landlords subjecting students desperate for accommodation to very poor quality housing. Bottom line - sort out your ethics and priorities.</p>
Mrs Claire White	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Not really. I think HMOs should be managed across the whole city and not just Oldfield park. I think the landlords should be forced to employ gardeners and maintain their properties properly. I don't think COUNCIL know the scale of HMOs across city. In Minster Way where I live there are approx. 6 or more HMOs but from a search on the council website it looks like only 1 has permission .</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes. Definately but there should be more onus on landlord to keep outside of property nice.</p>

	<p><u>Question 4 Any further comments?</u></p> <p>There should be a simple process to complain about an Hm</p>
<p>Ms Serena Casanova</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p>
<p>Mr Robert Parnell</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Not sure</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p>

	<p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>The city belongs to the people that live there not the ones that come and go! No affordable housing for our children to buy and students pushing up rent prices! We are suffocating</p>
<p>mr andrew osmond</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>no</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>yes</p> <p><u>Question 4 Any further comments?</u></p> <p>Twerton needs family housing ... not HMOs and student housing</p>
<p>Miss Emily Whitworth-Judd</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes!</p>

	<p><u>Question 4 Any further comments?</u></p> <p>Too many HMOs BR Ng too many cars, extra strain on our public services which they do not contribute to and we are losing too much family housing</p>
<p>Miss Natasha Jokic</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No, it appears to be unfairly anti student and will make the lives of thousands of students incredibly difficult.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p>
<p>Mr Nils Weng</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p><u>Question 4 Any further comments?</u></p>

Miss Elizabeth Lloyd	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No, I do not agree. Limiting HMOs forces the rent up and prices out families, early career professionals and students.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No. It implies that the occupiers of HMOs are inherently worse neighbours than owner occupiers.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No, I do not agree. By reducing HMO density renters are forced to spread out to areas that potentially have worse transport links and fewer services and amenities.</p> <p><u>Question 4 Any further comments?</u></p> <p>Our house, an HMO, has been occupied by the same students for 7 years. In what way are we transient occupants when we have lived in the same place for longer than many owners on the same street?</p>
Miss Eve Alcock	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p>

	<p><u>Question 4 Any further comments?</u></p> <p>I'm a student, and with the university recruiting so many students each year, this new policy is going to harm the student experience of studying at Bath.</p> <p>I also feel like the policy has been driven by anti-student feeling and prejudice, much of which is blown out of proportion by media and unfair, as lots of complaints made against students are not solely student issues, they can be applied to residents too.</p> <p>Furthermore, this will not just harm students. It will harm young professionals who wish to live in this city but cannot afford to get on the property ladder or rent an entire property for themselves. This is a huge demographic of people that this policy will harm. The situation with HMOs is bad enough as it is, please don't make it worse for under 30s who largely occupy them, especially as Bath's population is aging as it is!</p>
Mr David Zukas	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>The requirement that planning permission be given for turning a family home into an HMO in certain areas of Bath has two distinct disadvantages that make it almost unworkable - as I have found to my cost.</p> <p>Firstly, it takes far too long. Sellers expect to go from initial interest to signing contracts in a month or less, while the planning process takes six weeks from receipt of full documentation which itself takes time to acquire. In my case the sellers nearly pulled out as I could not risk</p>

	<p>signing contracts without planning permission.</p> <p>Secondly, the planners demand much more than just knowing whether the property breaches the percentage rule. In my case a local councillor orchestrated a campaign of opposition on grounds of parking which seemed to strongly influence the planning officers who demanded a restriction of numbers in the property to the same as the four members of the family who were selling it so the maximum number of cars parked in the street would remain the same. I eventually persuaded them there would not be a car per student. In fact, over the last three years five students in the house have never had more than 2 cars, usually only 1. The point being once in the planning process all kinds of issues can come up, not just whether the area is saturated with students. This creates difficulties and tensions that an ordinary house purchaser does not have to undergo, which seems unjust and unfair. I strongly oppose the extension of these heavy handed rules.</p>
<p>Mr Sebastian Brice</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>I'm not a student but I think this disadvantaged students unfairly</p>
<p>Mr Michael Lidbetter</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>I think it is important to consider the number of HMOs in certain areas of Bath.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>I think it should be a consideration, but it should not be a rule - each case ought to be judged on its merits.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>I fundamentally disagree with this idea - housing stock for students is already in too small a supply, leading to spiralling rents and poorly maintained housing. Students have to live somewhere, and finding somewhere both sensible and affordable is already</p> <p><u>Question 4 Any further comments?</u></p> <p>The solution to the housing problem lies not in reducing the number of HMOs, but forcing the various universities to rethink their policies of growth to ensure that they are not just sustainable for the institution, but also for Bath as a whole. The demand for HMOs will only drop when the universities provide affordable accommodation for students beyond their first year of study.</p>
Mr Ryan Haines	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No</p> <p><u>Question 4 Any further comments?</u></p> <p>This is going to harm young professionals in Bath, as well as students. As someone who wants to settle in Bath when I graduate, this policy will make it extremely difficult for me to do so.</p>

Mr Martin Cook	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>No</p>
Alisha Lobo	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No, I do not agree with the general approach</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No, this limits the housing availability for students.</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No, it fundamentally does not make sense given the current student population in Bath currently stands at 25%</p> <p><u>Question 4 Any further comments?</u></p>

	<p>This approach from the Council is based on limited research and a lack of understanding of students who make up 25% of the current population. The continued demonisation and 'othering' of students works on the continual basis that they are able to tolerate the 'shorter end of the stick'. It is insufferable and intolerable behaviour from elected representatives. This policy must be crafted in conjunction and with the essential consultation from students and the respective Unions as such a policy would impact them the most. The policy, at its very core, lacks practical and logical thought and must be reevaluated. I urge representatives to visit campuses and actually engage the student voices as well as the living experiences we undergo in Bath. Students are residents.</p>
<p>Mr Ru Quan Phuah</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>No</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No.</p> <p><u>Question 4 Any further comments?</u></p> <p>The rising numbers of student is the university's responsibility. They are only here to study in this beautiful city. Going through with this new policy will only be punishing students. Students will then be face with housing problems.</p>
<p>Mr Rob Crawford</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p>

	<p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>We agree with reducing future HMO Article 4 application approvals to a 10% threshold.</p> <p><u>Question 4 Any further comments?</u></p> <p>1. If intended (as not clear), we do not agree with reducing the number of existing HMO's to 10% that could be achieved by not renewing HMO licences, i.e. if the HMO is already licensed and compliant to the licence standard, the licence must be renewed also; 2. We would also not agree to reducing the number of existing rental properties where a licensing scheme is extended to additional property types, or where additional properties become subject to mandatory licencing due to a change in definition or similar.</p>
<p>Mr Daniil Demisin</p>	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Provided there's only one specialised operator of the routes connecting the city and the campus which runs only two services covering a fairly specific area of Bath, even further expansion of HMOs into areas that don't have bus stops of these routes will cause even greater congestion in the peak hours (as they will now need more than one trip to get there) as well as dramatically increaseconmute times, which are already eclipsing fourty minutes in the peak times.</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>No, especially with the combined proposal of reducing the threshold to 10%. Having not lived in residential part of town myself for long enough yet, from all the conversations I've had with my friends and acquaintances from higher years and their experienc</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>No! The rental market is already not coping with demand that result in a huge drop of available housing's quality (despite regular price hikes), please do not exacerbate it even further!</p>

	<p><u>Question 4 Any further comments?</u></p> <p>Being a student feels more and more like a being a cow milked every day. With the housing woes that are now predominantly solved by the landlords willing to rent out their properties, I believe it's a turn to held the owners of purpose-built student accommodation accountable to providing a service that does not cost and arm and a leg. 160+ a week is, to put it mildly, insane in my opinion</p>
Mrs Rachel Willis	<p><u>Question 1 Do you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of BathDo you agree with the general approach of the [draft] SPD to manage the concentration of HMOs in parts of Bath</u></p> <p>Yes</p> <p><u>Question 2 Do you agree with the Sandwich Policy proposed in the draft SPD?</u></p> <p>Yes</p> <p><u>Question 3 Do you agree with lowering the HMO threshold to 10% from 25%?</u></p> <p>Yes</p> <p><u>Question 4 Any further comments?</u></p> <p>I think these seem like realistic and quantifiable measures to tackle what is an ongoing problem.</p>
Bath Spa University Students' Union	<p>Bath Spa University Students' Union recognises the need for a variety of housing opportunities for students, young professionals and key workers. It also recognises the economic benefits of having two vibrant, successful universities within the city and also the need to preserve the historic and cultural importance of Bath and the surrounding area.</p> <p>The Union recognises the national shortage of housing, in particular good standards of social and affordable housing and the need for similar provision for students alongside purpose built student accommodation.</p> <p>The Union understands the complex and often competing pressures of balancing a housing market in such circumstances. It also recognises the pressures on communities this can bring and the negative perceptions that result.</p>

The Union also understands that the provision of affordable accommodation in itself is not enough to achieve this balance and it welcomes the opportunities to work with Bath and North East Somerset Council, other partners and the Student Community Partnership in ensuring sustainable community relations. It feels that perception is often different to reality and that complaints regarding students at Bath Spa University have fallen over recent years as this joint working has become an embedded part of managing community relations.

The Union is concerned about the number of students and local residents living in substandard accommodation and the numbers of students reporting such issues. It therefore welcomes the principles behind improvements to the licensing of properties to improve housing standards. We would want to see any additional licensing demonstrating a proactive approach to dealing with unscrupulous landlords and protecting students as tenants.

In response to the specific questions asked:

Question 1 – Do you agree with the general approach of the SPD to manage the concentration of HMOs in parts in Bath?

We think that the existing approach, limiting HMOs to a concentration of 25% has been successful in providing a balanced market but we feel a reduction to 10% without significant progress in providing alternative accommodation through the Local Plan will adversely affect both local people and students through higher rental prices. This could impact upon SMEs and public services as much as students and thus impact upon Bath as a viable sustainable community.

We would like to point out that the local economy, particularly in relation to small businesses such as bars and restaurants, which are a vital part of the tourism industry, rely on a student workforce and that moving students further out of the city may affect the local economy as much as the availability of part time work for students.

Question 2 – Do you agree with the Sandwich Policy proposed in the Draft SPD?

We feel a blanket sandwich policy without consideration of local nuances is too restrictive and a balanced approach looking at a percentage allocation within a given radius is a much better solution.

Question 3 – Do you agree with lowering the HMO threshold to 10% from 25%?

We believe that the current 25% threshold just about meets the current demand and lowering this to 10% will unduly affect available housing, not only for students, but also the local community. As a result it will fuel a rental market, leading to increasing prices that will make Bath unaffordable for key workers, low income households and students. The Council's Equality Impact Assessment (EIA) recognises this as a likely outcome but offers no solution.

	<p>As we have previously stated, the Union is deeply concerned about the poor quality of some housing in the city and the affect on students. The current lack of affordable housing means that students often have little choice but to accept poor living conditions. We therefore welcome the proposals to introduce additional licensing for HMOs. However, we are concerned that whilst the SPD states it will not apply the 10% threshold retrospectively, it does not clearly state that the introduction of licensing will be used solely to improve housing standards and not as a punitive measure to remove HMO status from existing dwellings which are below standard.</p> <p>The Council documentation has acknowledged that this policy may increase private vehicle hire as HMOs move to outlying areas. The EIA also fails to recognise that this may disproportionately affect disabled students and all households on low incomes (including students) who rely more heavily on public transport. Without a long term, sustainable alternative for student housing in the city, this may adversely affect the education choices for these groups. Affordable, reliable transport is already a major issue for students and the Union would like to see significant progress alongside any proposed changes to policy around HMOs.</p>
<p>Bath Preservation Trust</p>	<p>1. Do you agree with the general approach of the SPD to manage the concentration of HMO's in parts of Bath? Yes we do, though we continue to advocate a more locally responsive scheme (such as the Oxford scheme cited in our last response) so that lower tier placemaking and community/neighbourhood constraints can be brought into decisionmaking; we continue to advocate that some provision should be made for houses that are within close walking distance to a primary school; homes in these areas should be available to young families and therefore not permitted as an HMO unless some form of evidence is submitted that local families have not taken up a reasonable rental offer after a period of marketing. This could perhaps be added to Policy H2 (vii) as a consideration when weighing up the planning balance in decision-making.</p> <p>We continue to recommend that PBSA's are included in the density calculations for suburban character areas as the numbers of students in PBSA's skew neighbourhood demographics in exactly the same way as HMO's; this includes the seasonal use of local services which may be impacted by a concentration of students in one area.</p> <p>2. Do you agree with the Sandwich Policy proposed in the draft SPD? Yes we agree with the 'sandwich' policy as proposed.</p> <p>3. Do you agree with lowering the HMO threshold to 10% from 25%? The Trust welcomes the revised 10% density ratio for the Stage 1 and Stage 2 test; we believe this will result in a more balanced and healthy mix of residents in neighbourhoods across Bath.</p> <p>We hope that regular data capture and mapping updates will occur as the efficacy of the system will only be achieved with robust data management and active enforcement processes (we were pleased to hear about the very recent prosecutions for unlicensed HMO's). We</p>

	question whether the proposed quarterly data updates should not occur monthly.
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