Appendix A: LDP Draft Policies H9 and H11

H 9: HOUSES IN MULTIPLE OCCUPATION AND RESIDENTIAL CONVERSIONS WITHIN SETTLEMENTS

Within settlement boundaries, proposals to convert dwellings or underutilised commercial and industrial buildings to houses in multiple occupation, flats or bedsits will only be permitted where:

i. The development would be compatible with adjoining and nearby uses;

ii. In the case of buildings with an employment use, there is no over-riding need to retain that use;

iii. The development would not contribute to harmful concentration or intensification of HMOs in a particular area; and

iv. The development would not result in an overintensive use of a dwelling/building.

H 11: STUDENT RESIDENTIAL ACCOMMODATION

Proposals for student residential accommodation should be located within the Swansea Central Area, and must in the first instance assess the availability and suitability of potential sites and premises at this location, unless:

i. The proposed site is within a Higher Education Campus and is in accordance with an approved masterplan for the site; and

ii. In the case of the Swansea University Bay Campus, the development would not give rise to an additional number of residential units at the Campus than the number permitted by any extant planning permission; and

iii. The development would give rise to an overall benefit to the vitality and viability of the Swansea Central Area.

Appendix B: Engagement with Stakeholders

1.0 Engagement with Stakeholders

1.1 Consultation has been undertaken with various groups in order to inform the drafting of the SPG. The following consultation exercises have been undertaken:

a Workshop with local landlord representatives;

b Workshop with Councillors;

c Liaison with two Registered Social Landlords(RSLs) active in the Swansea area;

d Interview with a representative from the Wallich;

e Interviews with representatives at Swansea University and UoWTSD;

f Presentation at Swansea Student Liaison Forum meeting; and

g On-going liaison with Council officers across Departments, particularly licensing, planning policy, development management and highways.

1.2 A summary of the key points raised by each group is included below:

Landlord Workshop

1.3 A workshop was held with local landlords on the 7th November 2016. The key discussion points are summarised below:

a HMOs fulfil an important role in providing affordable accommodation, however landlords felt they are often negatively perceived. Their positive contribution in terms of addressing housing need, whether it be for students or to provide a means of affordable housing, was considered to not be fully recognised.

b The group felt that demand for HMOs is increasing in Swansea. This was considered to be as a result of increasing numbers of students which is outstripping supply. It was also recognised that the forthcoming Welfare Reforms are likely to increase demand.

c Whilst PBSA will help to meet the demand, this was not considered to be able to meet this entirely. Also PBSA was considered to be expensive and not affordable to all students.

d The new Bay campus was recognised to be changing the geographical demand for student HMOs. This was considered to result in more students requiring accommodation within HMOs closer to the Bay campus.

e Good quality HMOs that are properly managed were considered to not have adverse impacts. The group considered that more responsibility should be given to landlords and/or agencies to more closely manage HMOs.

f The Uplands and Castle wards were identified as being the most popular areas for HMOs due to the accessibility to the Universities and the City Centre.

g It was considered there should be more support for encouraging empty properties to be used as HMOs, as this would allow for properties to be brought back into use.

h It was considered that parking requirements for HMOs should be reduced and the Council should adopt a more flexible approach.

Members Workshop

1.4 A workshop was held with members on the 8 November 2016. The key discussions points are summarised below:

a Members recognised the positive impact of HMOs, however they considered a balance is required. It was agreed that the main issues are within areas where there are high densities of HMOs and where they are poorly managed.

b Members stated there was a need for a policy which works for the community. People are worried about the cohesion of their community as a result of increases in HMOs and PBSA. Members considered that the policy needs to protect areas that currently do not have high densities of HMOs and that are primarily characterised by family housing, such as St Thomas.

c Members felt it will be necessary to ensure that the data on the number of HMOs within the area is up to date and robust going forward in order for the policy to work. They considered that there was a need for a methodology to identify the extent of existing HMOs that do not require a license.

d Members supported a threshold and radius approach. They considered threshold areas should be clear and tally up with people's perception and the characteristics of a particular area. They considered a defined radius approach – 100m was suggested - may be more appropriate than calculating concentrations according to an alternative geographical scale e.g. Census output area. It was discussed that 100mmight be too large in Swansea, but further work would be undertaken to test different sizes.

e Members considered that the SPG should provide clear guidance on the parking standards and the criteria for assessing when a reduced level of car parking may be considered to be acceptable.

f It was recognised that PBSA can reduce the pressure for new student HMOs and should be encouraged. However, members did consider that some students prefer to live within HMOs and not all students may be able to afford to reside within PBSA.

Swansea Student Liaison Forum

1.5 NLP attended the Swansea Student Liaison Forum Meeting on 24th October. An overview of the commission was provided and initial queries answered. Key questions raised related to how and what impacts of HMOs were being analysed, how un-licenced HMOs might be taken account of in drafting the SPG and how the local community could be involved during the drafting process.

Consultation with Local RSLs

1.6 Feedback from Pobl and Coastal was sought via email and telephone. The main considerations highlighted were the implications of the Welfare Reform

Act which in 2018 will affect single persons under 35 in social rented accommodation.

1.7 The changes were considered to mean that a large number of individuals will no longer be able to afford to rent a social house or flat and as such will require shared accommodation. The demand for this type of accommodation was therefore expected to increase.

1.8 Housing Associations were considering the need to provide shared accommodation, which is likely to be delivered through the conversion of existing houses in order to meet this demand.

1.9 Feedback highlighted the need that this policy does not prejudice the establishment of HMOs in areas where there may be demand for such accommodation from single people affected by the Welfare Reform changes.

Interviews

Wallich

1.10 Feedback from the Wallich highlighted that they expect an increase in demand for smaller HMOs, due to forthcoming Welfare Reforms and Universal credit.

1.11 Wallich highlighted that there is a demand for shared accommodation in Swansea for asylum seekers and single persons between the ages of 25 and35 in particular.

1.12 No particular geographical pattern for demand was noted, although some preference was experienced amongst some groups for central locations, which are closer to support networks and community facilities.

Swansea University

1.13 The University highlighted an aspiration to grow in-line with the figures set out in this SPG and noted that University applications were at their highest.

1.14 The ‘cap’ being lifted in England and the Diamond Review were highlighted as key factors for the future, which will influence student numbers going forward.

1.15 Swansea University was noted to have a large nursing school and therefore the different needs of these students were noted. For example, these students often live nearer the hospital and have different term structures which often require HMO type accommodation. The University advised that the Council needs to develop a sufficiently flexible tool regarding HMOs which accounts for the accommodation requirements of ‘non-conventional students’ such as these.

1.16 The University has aspirations to achieve 20,000 FTE students over the next 3 years (this is equivalent to circa 25,000 bodies).

University of Wales Trinity St David

1.17 The University’s current plans seek to focus on development at SA1 and the Waterfront. Permission has been granted to vary the Outline Permission for the SA1 Waterfront Development to facilitate the implementation of UoWTSD’s revised masterplan proposals to develop its ‘Swansea Waterfront Innovation

Quarter'. Planning permission has been granted for Phase 1 which involves construction of a new Library and Faculty of Architecture, Computing and Engineering (FACE) & Technology Building.

1.18 Development at SA1 will be combined with a gradual rationalisation of some other of UoWTSD's existing bases in Swansea including the Townhill Campus which is a proposed housing allocation in the emerging LDP.

1.19 UoWTSD stated that overall student numbers across all of their campuses were not projected to change substantially.

Other Responses

1.20 A significant number of written responses were also received from the residents of Uplands. These responses raised a significant number of locally-specific issues identified by local residents ranging from experience of parking impacts, refuse, thoughts on what is a harmful HMO concentration and other matter.

Appendix C: Distribution of licensed HMO properties as of October 2016

Castle Ward Boundary

University Campus

Licenced HMO (as of 4th October 2016)

Nathaniel Lichfield & Partners
Planning. Design. Economics.

Project	Swansea HMO
Title	Licenced HMOs: Castle Ward
Client	City and County of Swansea
Date	01.12.2016
Scale	-
Drawn by	MAR
Drg. No	GIS\WE\31445\01-07

N

GIS Reference: S:\WE31445 - Swansea HMO\WE31445 - Swansea HMO - Licenced HMOs (Castle) - 01.12.2016.mxd

Uplands Ward Boundary

University Campus

Licenced HMO (as of 4th October 2016)

Nathaniel Lichfield & Partners
Planning. Design. Economics.

Project	Swansea HMO
Title	Licenced HMOs: Uplands Ward
Client	City and County of Swansea
Date	01.12.2016
Scale	-
Drawn by	MAR
Drg. No	GIS\WE\31445\01-06

N

GIS Reference: S:\WE31445 - Swansea HMO\WE31445 - Swansea HMO - Licenced HMOs (Uplands) - 01.12.2016.mxd

St Thomas Ward Boundary

University Campus

Licenced HMO (as of 4th October 2016)

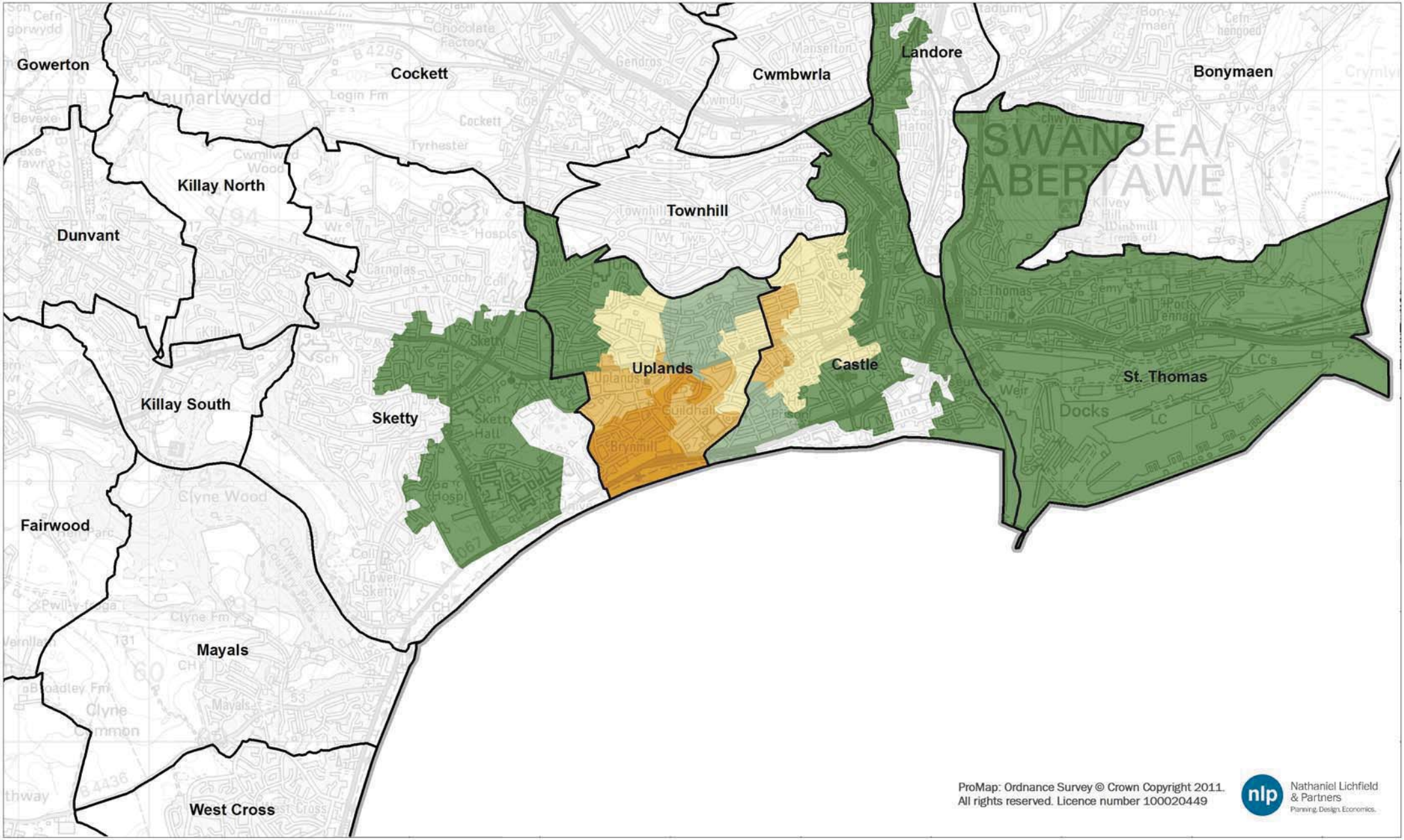
nlp Nathaniel Lichfield & Partners
Planning. Design. Economics.

Project	Swansea HMO
Title	Licenced HMOs: St Thomas Ward
Client	City and County of Swansea
Date	01.12.2016
Scale	-
Drawn by	MAR
Drg. No	GIS\WE\31445\01-08

N

GIS Reference: S:\WE31445 - Swansea HMO\WE31445 - Swansea HMO - Licenced HMOs (St Thomas) - 01.12.2016.mxd

Appendix D: Map of the concentrations of licensed HMOs as a percentage of the total residential properties in that given area



Number of licenced HMOs (as of 4th October 2016) as % of total residential stock by LSOA

0.0%	0.1% - 5.0%	5.1% - 10.0%	10.1% - 20.0%	20.1% - 30.0%	>30.0%

Ward Boundary

Source: City & County of Swansea Council

Appendix E: Map showing LSOA with 10% or more licensed HMOs of total residential properties

LSOA with 10% or more licensed HMOs of total residential properties

Nathaniel Lichfield & Partners
Planning, Design, Economics.

Project	Swansea HMO
Title	LSOA with 10% or more licensed HMOs of total residential properties
Client	City and County of Swansea
Date	08.12.2016
Scale	-
Drawn by	MAR
Drg. No	GIS\WE\31445\01-10

N

GIS Reference: S:\WE31445 - Swansea HMO\WE31445 - Swansea HMO - Licenced HMOs (by LSOA) - 10%+ licensed HMO of total residential properties - 08.12.2016.mxd

Appendix F: Parking SPG Sustainability Matrix

APPENDIX 5

SUSTAINABILITY

Sustainability points will be awarded to developments that meet the criteria below for their proximity, in terms of walking distance to local facilities, public transport, cycle routes and the frequency of local public transport. Award of these sustainability points will result in a reduction in parking requirement as detailed below:

Sustainability Criteria	Maximum Walking Distance	Single Sustainability Points
Local Facilities		
Local facilities include a foodstore, post office, health facility, school etc. Access to two of these within the same walking distance will score single points, whereas access to more than two of these will double the points score.	200m 400m 800m	3 pts 2 pts 1 pt
Public Transport		
Access to bus stop or railway station	300m 400m 800m	3 pts 2 pts 1 pt
Cycle Route	200m	1 pt
Frequency of Public Transport	Frequency	
Bus or rail service within 800m walking distance which operates consistently between 7am and 7 pm. Deduct one point for service which does not extend to these times.	5 minutes 20 minutes 30 minutes	3 pts 2 pts 1 pt

Thus the sustainability points score for a dwelling within 400m of a school and a post office (1 X 2pts = 2pts), within 300m of a bus stop (3pts) and having a service frequency of every 15 minutes but only between 8am and 6 pm (2 pts – 1pt = 1 pt) would score a total of 6 pts.

Reductions in Parking Requirement

Sustainability Points	Parking Reduction (Per dwelling)	Sustainability Points	Parking Reduction
Residential Developments		All Other Developments (other than shops and retail warehouses)	
10 pts	2 spaces	10 pts	30%
7 pts	1 space	7 pts	20%
		5 pts	10%

Other than for Zone 1 City Centre locations, the reductions in parking requirement for residential units shall not result in less than one parking space remaining and for all other developments the reduction shall not be applied unless an acceptable travel plan is also submitted.

Where an applicant wishes a reduced standard of parking to be considered, this form must be completed and submitted accompanied by relevant evidence.

Sustainability Criteria	Maximum Walking Distance	Single Sustainability Points
Local Facilities		
Public Transport		
Cycle Route		
Frequency of Public Transport	Frequency	

Reductions in Parking Requirement Requested

Sustainability Points	Parking Reduction (Per dwelling)	Sustainability Points	Parking Reduction
Residential Developments		All Other Developments (other than shops and retail warehouses)	

Other than for Zone 1 City Centre locations, the reductions in parking requirement for residential units shall not result in less than one parking space remaining and for all other developments the reduction shall not be applied unless an acceptable travel plan is also submitted.

Appendix G: Review of Planning Appeals

1.0 ## Appeals Review

1.1 This section reviews six English and Welsh planning appeal decisions from a range of local authorities who have adopted varying approaches to managing HMOs and/or student accommodation concentrations. As outlined in the earlier section, these broad approaches can largely be categorised into two methods - a 'threshold' or a 'criteria' approach.

1.2 This section summaries the key issues considered in each appeal case and then draws together some conclusions on the observed robustness of these two broad approaches.

Threshold Approach Appeal Cases

Cardiff

Address:	16 Rhymney Terrace, Cardiff, 17 Letty Street, Cardiff, and 93 Richards Street, Cardiff.
Development:	Three separate appeals relating to change of uses from C3 to a larger HMO (sui generis)
Appeal Ref:	APP/Z6815/A/15/3140589/3140590/3141810
Appeal Date:	22-06-2016
Appeal Decision:	Allowed

1.3 The main issue was the cumulative effect of the proposal on the amenity and character of the area, having regard to objectives of maintaining sustainable and balanced communities and whether the proposal conflicts with prevailing planning policies.

1.4 Using the Council's (draft) 50m radius tool, the Council argued that the three proposals were located within areas of high concentration of HMOs (ranging between 50%-59%).

1.5 A key determining factor in this appeal was that all three properties were demonstrated to be operating as shared (3-6 person C3 use class) dwellings at the point the new C4 use class change was introduced. Therefore they were subsequently identified to be a C4 use class. . In each appeal the proposed development was considered on the basis of an increase of occupancy from 6 unrelated persons (C4 use class HMO) to occupancy by 8 persons (sui generis HMO).

1.6 On this basis, the Council considered that each proposal would result in unacceptable cumulative harm to amenity because the increased proportion of transient residents in the area and proliferation of vacant properties in the summer months would lead to less community cohesion and place higher demands on social, community and physical infrastructure.

1.7 The Inspector noted that Cardiff's Local Development Plan (LDP) policy did not suggest any particular point beyond which further intensification of HMO occupancy will be considered less favourably. Whilst the Inspector did make reference to the Council's Supplementary Planning Guidance (SPG), which sets a concentration threshold, he gave no weight to this as it was draft and had only just been published for consultation.

1.8 The Inspector found that since the 3 properties are likely to continue in HMO use even if the appeals were not to succeed the proposals will make no difference to the number and proportion of properties in HMO use in their respective locations within the Cathays ward. Whilst he acknowledged that occupancy of each property by a larger number of unrelated persons may bring with it marginally greater issues of domestic rubbish control and street litter, he considered these matters are largely for management and resolution via effective organisation of services and community engagement strategies.

- **Key Learning Output:** Highlights the need for a SPG to set a framework for considering policy and determining 'cumulative impact'. Highlights the distinction between considerations of an intensification of HMO use and creation of a new HMO property.

Nottingham

Address:	4 Albert Grove, Nottingham
Development :	Creation of an additional seventh bedroom at the appeal property, which is in use as a HMO providing student lets.
Appeal Ref:	APP/Q3060/A/12/2181125
Appeal Date:	13-03-2013
Appeal Decision:	Dismissed

1.9 The main issue in this appeal was the effect of the development on the living conditions of nearby residents, with particular regard to the creation and maintenance of a balanced and sustainable community.

1.10 The appeal site was located within an area that had been identified as an area with a high concentration of students (an average concentration of 47% of student households). The Inspector made reference to the Council's Supplementary Planning Document (SPD) 'Building Balanced Communities', which indicated that in an area where students account for more than 25% of households, planning applications will be refused unless the applicant can clearly demonstrate the community balance will not be adversely affected. The applicant had not provided any evidence to show that the community balance in the area will not be adversely affected by the development.

1.11 The Inspector noted that there is no substantive evidence to suggest that the living conditions of neighbouring residents would be directly adversely affected by the development with particular regard to noise, disturbance and parking.

1.12 The Inspector considered the main issue to be cumulative impact. The Inspector accepted that, whilst the proposal relates to one bedroom, if replicated across the wider area, such development would lead to a more substantial increase in student accommodation, which would prejudice the creation and maintenance of a balanced community.

- **Key Learning Output:** An observed benefit of having a clear threshold and a potential method by which this threshold might be framed to allow the applicant the ability to provide evidence to demonstrate the absence of harm.

Nottingham

Address:	19 Swenson Avenue, Nottingham
Development :	Change of use from family residence to student accommodation.
Appeal Ref:	APP/Q3060/A/13/2210212
Appeal Date:	13-03-2014
Appeal Decision:	Dismissed

1.13 The main issues were the effect of the development on the maintenance of balanced communities and on the living conditions of local residents with particular regard to parking, noise and disturbance.

1.14 The Council's policies sought to not permit proposals resulting in additional student accommodation in areas with a significant concentration of student household unless the applicant can clearly demonstrate that the community balance will not be adversely affected. The threshold was set at 25% within a specified 'output area'.

1.15 The appeal site was located in an area where 46% of households are students, taking into account the average of surrounding output areas the concentration amounted to 30.7%. The Inspector concluded that the development would add to the concentration of students in the area and would have an adverse impact on the aims of policy to create sustainable and balanced communities.

1.16 The Inspector considered that an increased concentration would be likely to exacerbate adverse effects e.g. noise, unsatisfactory waste disposal etc. The appellant did highlight the potential (adverse) effects of existing student accommodation in close proximity on their own living conditions (if it continues to be used as a family house) however the Inspector gave little weight to this.

1.17 Whilst the Inspector recognised each application and appeal must be treated on its own merits he appreciated the Council's concern that approval of this

proposal could be used in support of similar schemes. He considered this is not a generalised fear of precedent, but a realistic and specific concern given the other properties nearby whose owners may well seek to let their property for the purposes of student accommodation. He therefore concluded that allowing this application could make it difficult to resist planning applications for similar developments in the future and the cumulative effect would exacerbate the harm described.

- **Key Learning Output**: Noted benefit of identifying a clear threshold and a way in which this might be framed to allow the applicant to provide evidence which demonstrates the absence of harm on the community balance.

Newport

Address:	Kardinale House, Newport
Development :	Change of use from a dwelling to a house in multiple occupation.
Appeal Ref:	APP/G6935/A/14/2214123
Appeal Date:	29-07-2014
Appeal Decision:	Dismissed

1.18 One of the main issues in this case was the effect of the proposed development (8 bed HMO) on highway safety – specifically parking.

1.19 The Council's maximum parking standard identified a requirement for 9 no. off-street parking spaces (1 space per bedroom and 1 space per 5 bedrooms for visitors) although the Inspector referenced another HMO appeal[1] where the Inspector concluded in relation to the CCS Wales Parking Standards that the guidance must be interpreted flexibly and with common sense. In that instance the Inspector used 1 space per bedroom and 1 space per visitors as the starting point, before applying reductions taking into account other factors. 'Other factors' in the case of this previous appeal were those which were defined in Appendix 6 of the CCS Wales Parking Standards which uses a 'points' system to take account of location and sustainability. In this previous appeal, the Inspector accepted that this was a suitable basis for establishing an appropriate reduction. The development subject to this appeal proposed to provide 3 spaces, although only 2 were independently accessible. The Inspector did not consider this was adequate and he was not presented with evidence to support the argument put forward which stated students have a lower rate of car ownership.

[1] Appeal at 41 Risca Road, Newport dated 04/07/2011 Ref: APP/G6935/A/11/2148693

- **Key Learning Output**: Noted flexibility and past Inspector interpretation of maximum parking standards for HMOs.

Criteria Approach Appeal Cases

Newcastle-Upon-Tyne

Address:	Land at 12 Belle Grove Terrace, Newcastle-upon-Tyne
Development :	Retention of three unauthorised HMOs
Appeal Ref:	APP/M4510/C/13/2196274
Appeal Date:	17-12-2013
Appeal Decision:	Allowed

1.20 The main issue in this case was the effect of the development upon (1) the character and appearance of the street scene and that of the locality with particular regard to the intensity of the use and (2) the living conditions of nearby residents having particular regard to noise and general disturbance.

1.21 The Inspector found that there was no harm to the street scene from intensification as, whilst the wider area has high concentration of HMOs, the street where the appeal site was located, is not dominated by a high proportion of HMOs. He considered that the limited introduction of three self-contained flats as HMOs, to a street which contains a significant element of family housing and a reasonable mix of accommodation, is unlikely to significantly tip the balance or change the character of the street scene.

1.22 It was not therefore considered to have demonstrable harm to the character of the wider locality due to the suitable and sustainable positioning and location of the building in comparison to the surrounding dense and compact locality.

1.23 The Inspector found that there was no harm to neighbour's living conditions. The Inspector considered that the location and building was suitable for use as HMO in terms of internal and external spaces and adequate off-street parking in the rear was provided.

1.24 The Inspector considered that in the event that noise levels are to such an extent that complaints are likely or cause statutory nuisances, the Council has sufficient powers under other legislation to address these issues. Whilst the Inspector recognises that planning conditions are unlikely to control noise emitted from occupiers congregating outside i.e. smoking, car doors slamming etc this is controlled by the managing agents, which have put in place mechanisms for neighbours to raise legitimate concerns / complaints. Additionally potential occupiers were vetted and references obtained prior to their tenancy.

1.25 The Inspector considered that these measures go some way in addressing concerns about anti-social behaviour and general disturbance.

1.26 The Inspector considered that haphazard waste disposal system can be controlled by condition.

- **Key Learning Output:** The noted increased scope for interpretation in a criteria led approach and the possibility that impact on character can be (very) localised – relating to an individual street.

Newcastle-Upon-Tyne

Address:	116 Grosvenor Road, Newcastle upon Tyne
Development :	Change of use from C3 to C4..
Appeal Ref:	APP/M4510/W/15/3133517
Appeal Date:	15-01-2016
Appeal Decision:	Dismissed

1.27 The key issues in this appeal related to 1) whether the proposal would result in the loss of a good quality, spacious and convenient dwellings suitable for occupation by a family, 2) the effect of the proposal on the character of the area and 3) the effect of the proposal on the living conditions of occupiers of neighbouring properties (particularly in relation to noise and disturbance).

1.28 The Inspector found that Newcastle's SPD on Maintaining Sustainable Communities accords with the provisions of NPPF which seeks to create sustainable, inclusive and mixed communities.

1.29 The Inspector specifically considered how to apply the specific criteria of Policy SC1.

1.30 Evidence from a local estate agent was submitted which suggested that whilst the property was suitable and attractive for family accommodation, buyers were deterred by the perceived 'student' character of the area. The Inspector contended that the loss of family housing and the changes in character which result from the loss were the items which Policy SC1 seeks to prevent. The Inspector therefore concluded that the house *would* be suitable for occupation by a family.

1.31 Another criteria the Inspector considered related to not permitting development that would lead to a level of HMO concentration which would be detrimental to the character of the area. In this case, the Council submitted evidence to demonstrate that 29 of the 63 properties on the lower part of Grovenor Road were HMOs (evidence derived from Council Tax Records and Electoral Registrations) whilst the appellant argued that 57 of the 63 properties were HMOs – although only 13 of these were licenced. The appellant's evidence was based on discussions with local residents, estate agents and property websites. Therefore the Inspector concluded that there was a high existing

level of HMOs and although the appellant did try to argue that the character has already shifted to one dominated by multiple occupancy. However the Inspector concluded that this would lead to an increased concentration of such uses which would further erode the character of the area.

1.32 The Inspector then considered the policy's criterion which seeks to protect against harm to the living conditions of neighbouring residents through the introduction of additional activity, access, traffic or parking. The Inspector considered that due to more comings and goings there would likely be an increased level of noise and disturbance experienced by occupiers of adjacent and surrounding properties.

- **Key Learning Output:** The increased scope for interpreting what is an unacceptable level of HMO concentration (considering impact upon the character of the area). Evidence of licenced and un-licenced HMOs were also drawn upon.

2.0 Conclusion

2.1 This review draws together some key issues identified in this sample of HMO appeals. Whilst it has been rather focused, it is apparent that no absolute conclusion can be reached which confirms either the 'criteria' or 'threshold' approach is more robust at appeal. This review demonstrates there are advantages and disadvantages to both approaches.

2.2 A **threshold approach** by its inherent nature provides a very clear benchmark to work from in determining what is an acceptable HMO concentration. In this small sample, where authorities have formally adopted a 'threshold' approach Inspectors have not sought to revisit whether this threshold is appropriate or whether the area it is measured on is suitable. Rather the key matters at appeal have then focused upon whether there is any evidence to demonstrate that the proposal would not have adverse impacts on issues such as external appearance, amenity, parking etc.

2.3 Specifically Nottingham's (threshold) policy approach did allow for some form of flexibility in applying its threshold. It stated that planning applications which breach the identified threshold would be refused unless the applicant can clearly demonstrate community balance will not be adversely affected. In both appeals reviewed in this location the appellant failed to demonstrate this point however allowing for some of flexibility could in theory allow scope for a more bespoke assessment of impact upon community balance.

2.4 The appeals in Newcastle were useful to understand the merits and dis-merits of a **criteria approach**. In these cases, by not setting a threshold this has allowed for consideration of impacts on a site by site basis. However the (opposing) appeal decisions demonstrate there can be difficulties in how the impacts of HMO concentrations on the character of area are considered. This

has yielded some uncertainty but ultimately allows each case to be considered on its own merit.

Implication for Swansea HMO concentration tool

2.5 Emerging Swansea LDP Policy H9 (Houses in Multiple Occupation and Residential Conversions within Settlements) sets out 4 criteria which proposals to convert dwellings or underutilised commercial and industrial buildings to HMOs will need to adhere to. The key criteria which relates to HMO concentration states that *"the development would not contribute to harmful concentration or intensification of HMOs in a particular area* ".

2.6 Accompanying paragraphs to this policy state that a SPG will define what is deemed a harmful concentration or intensification by setting out threshold limits to be applied to the proportion of the total building stock that HMOs should comprise in different parts of the County.

2.7 This appeal review (albeit a small sample) has indicated that the principle of a threshold approach is appropriately robust.

Appendix H: Benchmark Review of Other Planning Policy Approaches

1.0 **Other Policy Approaches Review**

1.1 This section provides a review of six other local planning authorities in Wales and England, strategies and policy frameworks for houses in multiple occupation (HMOs) and purpose built student accommodation (PBSA), in order to identify common practices and approaches. We also include a short summary of the relevant car parking standards in each of these areas and specifically for the 2 Welsh examples summarise the licencing context.

1.2 A summary of the key findings is outlined at the end of this section.

2.0 **Case Study 1: Cardiff**

Adopted Development Plan

2.1 Cardiff's adopted Local Development Plan (LDP) (2006-2026) has a specific policy (H5) relating to the conversion or sub-division to flats or HMOs. It sets out the following 4 criterion which need to be met:

a The property is of a size whereby the layout, room sizes, range of facilities and external amenity space of the resulting property would ensure an adequate standard of residential amenity for future occupiers.

b There would be no material harm to the amenity of existing nearby residents by virtue of disturbance, noise or overlooking.

c The cumulative impact of such conversions will not adversely affect the amenity and/or the character of the area; and does not have an adverse effect on local parking provision.

2.2 The LDP has no specific policy for PBSA.

Supporting Documents

2.3 Cardiff has a draft Supplementary Planning Guidance (SPG) on HMOs (April 2016), which sets out their policy approach to dealing with planning applications for HMOs. This SPG was consulted upon until 20th October 2016 and has been revised to take of comments. This revised SPG has very recently been approved by Council and therefore has SPG status.

2.4 The Council sets a two-tiered HMO threshold, of 20% within the two wards that have the highest concentration of HMOs, and a 10% threshold in all other wards. It also sets a 50m radius which includes all dwelling houses that have their main frontage facing the street.

2.5 If more than 20% of the dwellings within the highly concentrated areas, or if more than 10% of the dwellings in all other wards, within a 50 m radius of the proposed HMO are already licenced HMOs, then the Council would look to refuse this application unless its implementation, judged in the light of other

material considerations, would serve the public interest. The SPG includes a worked example but does not include mapping to indicate where HMOs properties are currently located.

2.6 The SPG also sets out design criteria for assessing proposed HMOs. This takes into account: room size and facilities, recycling and refuse storage, amenity space, parking, cycle storage, noise, light and outlook, access, external alterations and internal alterations impacting on external appearance.

Licencing Context

2.7 Cardiff operates a two-tiered HMO licencing approach:

- **Mandatory HMO licencing system:** Citywide

2.8 Applies to dwellings that are three-storey or more and contain at least five residents not forming a single household.

- **Additional HMO licensing system:** Cathays and Plasnewydd wards only.

2.9 Applies to properties with three or more residents not forming a single household.

3.0 Case Study 2: Newport City Council

Adopted Development Plan

3.1 Newport's adopted LDP (2011-2026) has a specific policy (H8) relating to HMOs. It sets out 4 criteria that proposals to subdivide properties into HMOs will need to adhere to:

a The scale and intensity of use does not harm the character of the building or locality and will not cause an unacceptable reduction in the amenity of neighbours or result in on street parking problems;

b Does not create an over concentration of HMOs in one area which would change the character or create an imbalance in the housing stock;

c Adequate noise insulation is provided;

d Adequate amenity for future occupiers.

3.2 The Council has no specific policy for PBSA.

Supporting Documents

3.3 Newport Council adopted its SPG on HMOs in August 2016. It sets a two-tier threshold, which means that the Council will not support a planning application that would take the number of HMOs, considered as a proportion of local housing stock, above a specified limit.

3.4 In ‘defined areas’ this limit is 15%; in other areas, 10%. It notes that proposals that exceed these figures will be unsuccessful unless their implementation, judged in the light of all other material considerations, would serve the public interest.

3.5 Like Cardiff, it uses a radius to identify an area in which to apply the thresholds limits. This area will include all residential properties where their entire principal elevations lie within a 50 m radius. It notes that, in areas where there are only a handful of properties within the 50m radius, the council will apply the relevant threshold to an area that contains at least 10 dwellings.

3.6 Should a 50m radius fail to capture the required number of properties, the Council will select the nearest 10 dwellings from the same side of the street as the proposed HMO.

3.7 The SPG includes a worked example of this tool and also includes a link to an on-line mapping tool which shows where other HMOs are. The SPG also sets out design criteria for assessing proposed HMOs. This takes into account: parking provision, amenity considerations, character of the area, design considerations, alterations to listed buildings, alterations to buildings within conservation areas.

3.8 Licencing Context: Newport operates a two-tiered HMO licencing approach although it’s not clear from the SPG which geographic areas this covers:

- **Mandatory HMO licencing system**

3.9 Applies to dwellings that are three-storey or more and contain at least five or more persons.

- **Additional HMO licensing system**

3.10 Applies to properties that contain more than two households.

4.0 Case Study 3: Falmouth

4.1 Given the merger of several smaller authorities into one unitary authority - Cornwall Council – the policy context for the Falmouth area is complex. However of most recent note is the current consultation on Cornwall Council’s Site Allocations Development Plan Document (DPD). With regards to Falmouth, the DPD sets out a three pronged approach to manage HMOs and PBSA (see para 7.44):

a The introduction of an Article 4 Direction and Neighbourhood Plan, which will be able to prevent further loss of the existing houses stock to student accommodation;

b Any increase in the student cap at the Penryn Campus should only be lifted in a phased manner, directly linked to the delivery of bespoke, managed, student accommodation (i.e. when a student accommodation scheme has been built, an equivalent increase in the Penryn Campus

student cap is allowed). An appropriate mechanism must also be implemented to monitor any future growth and its impacts; and

c The identification of a small number of sites that could appropriately deliver managed student accommodation; with sites identified both off-site and on-site to satisfy future needs.

4.2 To facilitate the third point, a series of site options have been identified to support the delivery of managed student accommodation.

4.3 It further notes that the any proposed development relating to student accommodation, including change of use, should also have due regard to the Falmouth Neighbourhood Plan, which when adopted will form part of Cornwall's Local Plan and will provide policies to manage student accommodation proposals within the town.

Falmouth Neighbourhood Plan & forthcoming HMO Article 4 Direction

4.4 On request from Falmouth Town Council, Cornwall Council is in the process of introducing an Article 4 Direction in Falmouth. The Article 4 would require new HMOs in Falmouth that fall into the Dwelling Use Class C4 to apply for planning permission. The Article 4(1) direction comes into force on 16 June 2017.

4.5 The policy approach for dealing with planning applications for HMO will be set out within a Falmouth Neighbourhood Plan. The Neighbourhood Plan is currently in progress and not available in draft form at this stage.

4.6 The Neighbourhood Plan will set out where HMOs would and would not be permitted. Planning applications will be assessed against the policies set out in that plan. The intention is stated to not be to prevent any future HMO increases, as they are recognised as a vital element of Falmouth's housing options. The Article 4 will be used to maintain a balanced and sustainable mix of housing options in particular locations by ensuring HMOs don't reach unsustainable levels in concentrated areas. It is stated that research identified particular clusters of HMOs – ranging from 12% to 24%.

4.7 The Neighbourhood Plan website states that this forthcoming Plan could be used to set the criteria for how these planning applications are decided. These could, for example,

a prevent further changes of use to HMO in the areas already significantly affected by HMOs if they would cause harm to amenity or community balance;

b set positive criteria for planning permissions for changes of use to HMO in other areas, subject to an upper limit.

5.0 Case Study 4: Birmingham City Council

Adopted Plan

5.1 The Unitary Development Plan (UDP) is the current existing development plan for Birmingham. It was adopted in 1993 and reviewed in 2005. It has a specific policy relating to HMOs. The following criteria is used in such determining planning applications:

a effect of the proposal on the amenities of the surrounding area and adjoining premises;

b the size and character of the property;

c the floorspace standards of the accommodation;

d the facilities available for car parking;

e the amount of provision in the locality.

5.2 The following guidance will also apply:

5.3 The use of small terraced or small semi-detached houses for HMO will cause disturbance to the adjoining house (s) and will be resisted. The impact of such a use will depend, however, on the existing use of adjoining properties and on the ambient noise level in the immediate area.

5.4 Where a proposal relates to a site in an area which already contains premises in similar use, and/or properties converted into self-contained flats, and/or hostels and residential care homes, and/or other non-residential uses, account will be taken of the cumulative effect of such uses upon the residential character and appearance of the area. If a site lies within an Area of Restraint identified in chapters nine to twenty-one or in Supplementary Planning Guidance, planning permission may be refused on the grounds that further development of such uses would adversely affect the character of the area.

Supporting Documents

City Wide Policies - Residential Uses Specific Needs SPG

5.5 The Council has an adopted SPG 'Specific Needs Residential Uses', which provides further guidance on space standards for HMOs and also minimum bedroom sizes for Student Accommodation.

5.6 The Council recognises that the demand for student residential accommodation of all types generally exceeds the supply available and therefore does not wish to unduly restrict the supply of accommodation.

5.7 It notes that parking for student accommodation is treated on its merit through proximity to the campus.

Area based planning policies - Selly Oak, Edgbaston and Harborne: Houses in Multiple Occupation Article 4

5.8 Birmingham City Council introduced an Article 4 Direction in Selly Oak, Edgbaston and Harborne, which requires planning permission for the change of use of a family home to a use class which falls into dwelling Use Class C4 – "Houses in Multiple Occupation. The Article 4 direction came into force on 30 November 2014.

5.9 Alongside the Article 4 direction, a Planning Policy Document (November 2014) has been prepared and will be a material planning consideration until the policy is included in the forthcoming Development Management Development Plan Document.

5.10 The policy aims to manage the growth of HMOs by dispersing the locations of future HMOs and avoiding over-concentrations occurring, thus being able to maintain balanced communities. The policy approach is:

Policy HMO1

Conversion of C3 family housing to HMOs will not be permitted where there is already an over concentration of HMO accommodation (C4 or Sui Generis) or where it would result in an over concentration. An over-concentration would occur when 10% or more of the houses, within a 100m radius of the application site, would not be in use as a single family dwelling (C3 use). The city council will resist those schemes that breach this on the basis that it would lead to an overconcentration of such uses.

Emerging Planning Policies

5.11 The Council has been in the process of preparing its Development Plan which will cover the period up until 2031.

5.12 The latest version of the Plan (pre-submission document part 3, 2013) has a specific policy relating to PBSA. It notes that PBSA provided on campus will be supported in principle subject to satisfying design and amenity considerations. Proposals for off campus provision will be considered favourably where:

a There is a demonstrated need for the development

b The proposed development is very well located in relation to the educational establishment that it is to serve and to the local facilities which will serve it, by means of walking, cycling and public transport

c The proposed development will not have an unacceptable impact on the local neighbourhood and residential amenity

d The scale, massing and architecture of the development is appropriate for the location

e The design and layout of the accommodation together with the associated facilities provided will create a positive living experience.

5.13 The Development Plan has no specific policies relating to HMOs.

Case Study 5: Nottingham City Council

Adopted Plan

5.14 Nottingham City Council's Aligned Core Strategy (adopted 2014) recognises that increased numbers of student households and HMOs has altered the residential profile of some neighbourhoods dramatically, and has led to unsustainable communities and associated amenity issues.

5.15 It notes that the problem is most acute within Nottingham City, and in order to help address this, the City Council introduced an Article 4 Direction in March 2012 that requires planning permission to be obtained before converting a family house (C3 dwelling house) to a (C4) House in Multiple Occupation anywhere within the Nottingham City Council area.

5.16 The Core Strategy also encourages PBSA in appropriate areas. It recognises that such developments can provide a choice of high quality accommodation for students and also assist in enabling existing HMOs to be occupied by other households, thus reducing concentrations of student households.

Emerging Policies

5.17 The policy approach to considering planning applications for student accommodation and HMOs is set out in the emerging Nottingham City's Part 2 Local Plan (Publication Version January 2016). The plan has a specific policy (HO6) relating to HMOs and PBSA.

5.18 In assessing planning applications for HMOs, the Council will consider the following criteria:

1 Existing proportion of HMOs and/or student households and whether this will amount to a 'significant concentration'

2 The individual characteristics of the building or site and immediate locality;

3 Any evidence of existing HMO and/or PBSA within the immediate vicinity of the site that already impacts on local character and amenity;

4 Impact of the proposed development on the character and amenity of the area;

5 Whether the proposal would incorporate adequate management arrangements, and an appropriate level of car and cycle parking having regard to the location, scale and nature of development;

6 Whether the proposal would result in the positive re-use of an existing vacant building or site that would have wider regeneration benefits;

7 Whether adequate evidence of the need for new PBSA of the type proposed has been provided; and

8 Whether new PBSA is designed in such a way that it can be capable of being re-configured through internal alternations to meet general housing needs in the future.

5.19 Where there is already a 'significant concentration' of HMOs and/or student households in an area, planning permission will not usually be granted for further HMOs or PBSA. A 'Significant Concentration' is considered to be 10%.

5.20 Appendix 6 of the Local Plan Part 2 sets out the methodology for determining areas within a significant concentration of HMOs. It notes that these areas are identified using Council Tax information to map the properties where student exemptions apply combined with Environmental Health records of properties known to be in use as HMOs.

5.21 It identifies Output Areas comprising of 10% or more HMOs/Student Household, along with contiguous Output Areas. Output Areas are defined by the Office for National Statistics and are stated in this Plan to provide the only independently defined and convenient geographical units for the purpose of this approach. An Output Area comprises relevant data for approximately 125 households.

5.22 A weighing factor is applied to council tax exemption data in respect of Halls of Residence / PBSA of similar formats, based on the application of an average student household size of 4 persons. Therefore a 100 bed space Hall of Residence would equate to 25 student households.

5.23 The area of measurement for determining whether there is a 'significant concentration' is the Home Output Area within which a development proposal falls and all Contiguous Output Areas (those with a boundary adjoining the Home Output Area), thereby setting the development proposal within its wider context.

5.24 Having defined the relevant Output Area cluster, Council Tax data and Environmental Health records are then used to provide a combined total for HMOs / Student Households within the cluster. Essentially the information will show that there are 'x' households within the cluster (taken from Ordnance Survey Address Point data and cross-checked with Council Tax Household data) of which 'y' are HMOs / Student Households (taken from the Council Tax and Environmental Health data). This is expressed as a percentage.

5.25 The Plan also has a specific policy (HO5) relating to the location for PBSA. It notes that PBSA of an appropriate scale and design will be encouraged in the following locations:

a Allocated sites where student accommodation use accords with site specific Development Principles;

b University campus;

c Within the city centre boundary;

d Above shopping and commercial frontages within defined Town, District and Local Centre, and within other commercial frontages on main transport routes where this assists in the regeneration of underused sites and premises;

e Sites where student accommodation accords with an approved SPD.

Supporting Documents

5.26 The Council's 'Building Balanced Communities' SPD (adopted 2006 and reissued in March 2007) sets out, amongst other things, the Council's approach to the provision of student housing. The SPD pre-dates the Council's Core Strategy and Emerging Local Plan. The SPD seeks to encourage the provision of PBSA in appropriate locations and to restrict the provision of further student housing in areas with a recognised over-concentration of students, where the creation and maintenance of balanced communities is therefore seen as an issue.

5.27 With regards to HMOs, the SPD notes that planning permission will be refused where the development would prejudice the creation and maintenance of balanced communities. In deciding whether the creation and maintenance of balanced communities is prejudiced, the City Council will have regard to:-

a the percentage of households in a locality that are made up solely of full time students (appendix 1);

b the overall number of students in an area, which can have an important influence on community balance. For instance, the presence nearby of PBSA can lead to large numbers of students in an area of relatively few student households; and

c whether the area currently has relatively few student households, but is in danger of becoming unbalanced as numbers increase and the problems identified in appendix 2 are beginning to manifest.

5.28 An area of significant student concentration are 'output areas' which comprise 25% of student households and above. In an area where students account for more than 25% of households, planning applications will be refused unless the applicant can clearly demonstrate that the community balance will not be adversely affected.

6.0 Case Study 6: Newcastle City Council

Adopted Plan

6.1 Newcastle City Council adopted its Core Strategy and Urban Core Plan (CSUP) on 26 March 2016. It notes that the Council will continue to support

PBSA in suitable and accessible locations supported by access to local services. The policy seeks to focus the provision of PBSA within the Urban Core.

6.2 The UDP was adopted in 1998 although some policies still remain saved following adoption of the CSUP in 2016. The main policy (H1.5) relating to student housing in the UDP is however superseded by the CSUP.

6.3 The CSUP includes a broad policy (CS11: Providing a Range and Choice of Housing) which seeks to focus the provision of PBSA within the Urban Core.

6.4 The UDP has a (saved) Development Control Policy Statement (5) which refers to HMOs. It notes that the following criteria will be taken into account in determining planning applications for HMO:

a General nature of the locality, including the incidence and impact of intensive residential uses;

b Effect on the character of the locality;

c Size and suitability of the premises;

d Outlook and privacy of prospective occupants;

e Effect on adjacent and nearby occupiers;

f Impact on any necessary fire escapes;

g Availability of adequate, safe and convenient arrangements for car parking;

h Local highway network and traffic and parking conditions;

i Provision for refuse storage facilities;

j Ease of access for all sections of the community;

k Views of consultees and nearby occupiers;

6.5 It further notes that the grant of planning permission for HMO's may include conditions relating to, inter alia:

a Soundproofing of premises;

b Car parking to be provided before first use;

c Refuse storage facilities;

d Provision of means to enable access for all.

Supporting Documents

6.6 In 2011, the Council introduced the Maintaining Sustainable Communities SPD with the aim of controlling the growth of HMOs. Since that time the Council has adopted its Core Strategy and Urban Core Plan. The Council has therefore reviewed the 2011 SPD, and an updated draft SPD (September 2016) is out for consultation until 25 November 2016.

6.7 It notes that the Council introduced three HMO Article 4 Directions between 2011 and 2013.

6.8 Policy SC1 – HMO Changes of Use sets out the policy against which planning application for HMOs will be considered. The Council does not adopt a threshold approach to assessing the acceptability of planning application for HMOs. Rather the policy sets out 9 criteria, which take into account factors such as loss of a suitable family home (in Article 4 areas). Other considerations listed are also generally applied in all locations – such as unacceptable harm to the amenity of neighbouring residents, detrimental to the character and appearance of the locality or existing building, highway and parking issues, whether it would lead to a level of concentration of such uses that would be damaging to the character of the area (level of concentration is not defined).

6.9 In the case of Tyneside flats within Article 4 areas, the policy further restricts the change of use of an upper flat to an HMO, and the extension or alteration of an upper flat HMO to facilitate the creation of additional habitable space within the roof space through the insertion of new or increased size rooflights or dormer window extensions.

6.10 Within an HMO Article 4 area, the policy notes that PBSA will not be granted. The supporting paragraph notes that developments for new PBSA in Article 4 areas would also result in an increased density of shared housing in areas which already experience impacts associated with this form of accommodation. It is therefore also necessary to control the growth of this form of development. The form of development covered could be new build or conversion of existing properties and cover tradition three to six person small HMO, larger HMO or accommodation that is designed specifically for student or other forms of occupation.

6.11 Policy SC2: Housing in the Urban Core refers to residential development in the Urban Core of the City. The policy requires the design of PBSA, including HMOs (both C4 and Sui Generis) to ensure that it can be adaptable to alternative future uses.

Interim Planning Guidance on Purpose Built Student Housing (November 07)

6.12 The Council has an adopted Interim Planning Guidance on PBSA. This document pre-dates the Core Strategy and Urban Core Plan. The document sets out an overall strategy to address student housing needs in Newcastle, and deals specifically with new purpose built student housing. It seeks to promote and enable the development of a range of good quality PBSA schemes in appropriate, sustainable locations. The document notes that alongside encouraging the development of PBA, the Council is seeking to discourage the conversion of family houses into flats or HMOs.

6.13 It notes that relevant guidance relating to PBSA may also be included within Area Action Plan DPD, and within development briefs for individual sites.

6.14 The document identifies potential sites for student accommodation, many of which are within and at the edge of the city centre. Other sites have been identified where these are accessible to the University Campuses via sustainable means of transport. In particular it considers:

a Site Size

b Estimated Student Bed spaces

c Location

d Current use/background

e Constraints

f Ownership, Property and Land issues

g Timescales

h Planning Context including sustainability / transportation etc.

i Regeneration Issues.

6.15 A scoring framework was developed in order to assess the overall suitability of these sites. The criteria used is as follows:

a Accessibility to the Campuses

b Site size / Capacity

c Planning Merits

d Regeneration Merits

e Availability / Timescales

6.16 The resulting site scores were intended to help identify which sites were potentially suitable without prejudicing consideration of any planning application.

Case Study 7: Belfast City Council

6.17 The Council has a guidance documents on the management of HMOs referred to as the 'Subject Plan'. The Belfast HMO strategy is to:

a Protect the amenity of areas where multiple occupation is, or is likely to become, concentrated;

b Accommodate the need and demand, while maintaining a community balance;

c Focus HMO development in areas where it can contribute to regeneration; and

d Promote appropriate development of purpose built student accommodation.

6.18 The Council adopt a threshold approach to identify the extent to which further HMO development will be permitted in different locations. In areas where there are currently houses in multiple occupation, or within an area that is likely to become concentrated, planning permission will only be granted where the number of HMOs does not exceed 30% of all dwelling units within the Policy Area.

6.19 The 30% threshold was considered to be the upper limit for conversion to multiple occupation, as this level could potentially assist regeneration but at the same time would not necessarily result in the local communities becoming imbalanced. The Council identified 22 areas where HMOs are concentrated and which already exceeds 30% of the dwelling units. Consequently, no further HMO development will be permitted within these areas until such time as the proportion of HMOs falls below 30% i.e. the change of use of HMOs to a dwelling house. Outside of the 22 HMO Policy Areas, and designated HMO Development Nodes (this refers to HMOs within commercial or shopping areas, the Council adopts a 10% threshold based on the number of dwelling units on that road or street. In instances where such road or streets exceeds 600m in length, the number of dwelling units within 300m either side of the proposal on that road or street will be taken into account.

6.20 The Council consider that setting a limit of 10% will allow a degree of managed and controlled growth of HMOs.

6.21 The Council also adopts a criteria based policy in determining planning applications for HMOs. It notes that planning permission will only be granted for HMOs where all of the following criteria are met:

a Any HMO unit within a Policy Area does not exceed 4 bedrooms;

b Any HMO unit is not wholly in the rear of the property without access to the public street;

c The original property is greater than 150 sq m gross internal floor space when any house is being converted to flats for HMO use;

d All flats for HMO use are self-contained

Purpose built student accommodation

6.22 In June 2016, the Council adopted its Supplementary Planning Guidance (SPG) on Purpose Built Managed Student Accommodation. The guidance is structures into 6 key criteria consisting of:

a Location and accessibility;

b Design quality

c Impact and scale

d Management

e Need

f Planning agreements.

7.0 Car Parking Standards

A summary of the various car-parking standards is included overleaf:

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	Cardiff 2010 Parking Standards	Newport 2015 Parking Standards	Cornwall 2004 Parking Standards	Birmingham 2012 Parking Standards	Nottingham 2016 Emerging Parking Guidance	Newcastle 2015 Parking Standards	Belfast Belfast Metropolitan Area Plan
HMOs	**C3 HMOs in non-central areas:** maximum 1 car parking space per unit, with 0.25 visitor spaces per unit and 0.25 cycle parking per unit. Not clear what the requirement would be for HMOs in central areas.	**HMOs in central areas:** standards do not specifically differentiate for HMOs – just 'houses' at 0.5 to 1 space per unit. **HMOs outside of the city centre**: the requirement for HMOs is 1 space per bedsit, and 1 visitor space per 5 units.	No specific standard for HMOs. Studios/bedsits is 1 space / 3 units.	No specific standard for HMOs	**C4 HMOs** is differentiated although it notes that it is based on discussions with Planning/Highways	No specific differentiation for HMOs.	No specific differentiation for HMOs.
PBSA	**Sui Generis PBSA in all areas:** 1 space per 25 beds, and 0.25 cycle visitor short spaces in addition at 0.05 per unit	**PBSA within the City Centre**: 1 space per 25 beds for servicing, wardens and drop-off areas, with no visitor spaces. **PBSA (under college/university control) outside of the City Centre:** 1 space per 25 beds for servicing, wardens and drop-off areas. The visitor car parking requirement is 1 space per 10 beds (for students and/or visitors).	Higher and Further Education: – 1 sp/2 staff and 1 sp/15 total possible students.	**Purpose Built Student Accommodation (Use Class C2):** Area 1: 1 space per 10 bedrooms. Area 2: 1 space per 7.5 bedrooms. Area 3: 1 space per 5 bedrooms (lower provision will be appropriate in campus situations)	**C2 PBSA is differentiated**. Notes that it is based on discussions with Planning/Highways	**No differentiation for PBSA but (C3) student Accomodation is specified:** 1 per 4 bed space and where appropriate 1 per unit of warden accommodation and suitable pick up and drop areas. In some instances no parking will be acceptable in the city centre.	No specific differentiation for PBSA.

8.0 Summary

8.1 The review has shown there is a variation in the manner in which individual local authorities have sought to manage HMOs and PBSA.

Method of Managing HMOs

8.2 This review has identified two broad approaches:

1 Threshold; or
2 Criteria.

Threshold

8.3 Those that adopted a threshold approach defined a geographic area (a radius or an output area). This area was then used as a basis for considering whether an identified concentration threshold was breached.

8.4 Defined radius sizes varied between 50m and 100m and took account of licenced HMOs in these areas. Although in some instances, account was also taken of unlicenced HMOs as well.

8.5 Belfast looked at the number of dwelling houses within the street as a basis for considering whether an identified concentration threshold was breached.

8.6 The Nottingham case study took account of student only HMOs, PBSA and Halls of Residences within a defined 'output area' comprising approximately 125 households.

8.7 Threshold identified in the case studies varied between 10%, 15%, 20%, 25% and 30%.

Criteria

8.8 Newcastle was an example where a specific percentage threshold was not defined and instead the Authority used a criteria policy to assess the acceptability of a proposed new HMO. Slightly stricter controls were applied within Article 4 areas compared with other areas. The identified criteria policy related to topic areas such as amenity, character, appearance and refuse.

Managing PSBA

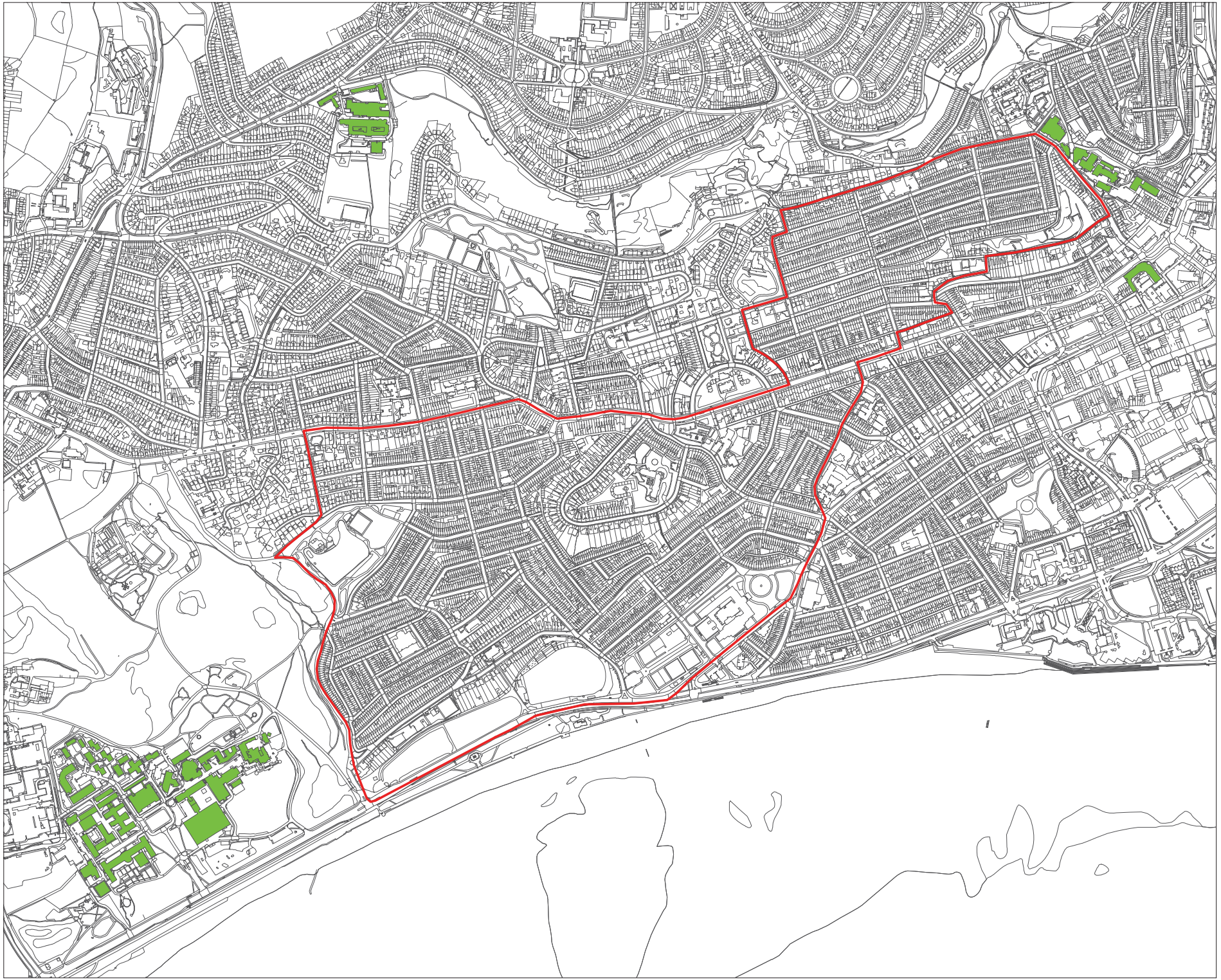
8.9 Methods of managing PSBA differed between case studies, although most sought to focus such developments in existing campus locations and/or central areas. Case studies in Newcastle and Falmouth showed some authorities had sought to proactively identify prospective sites for PSBA development.

Car Parking Standards

8.10 A wide range of approaches to car parking standards was identified with no real correlation in approach. Some case studies identified specific standards

for HMOs and/or PBSA whilst others did not. This mix in approaches, to some degree, reflected the varied age of the various guidance documents (i.e. some pre-dated changes to the use classes order).

Appendix I: Threshold Map



Proposed 30% Threshold Area

University Campus

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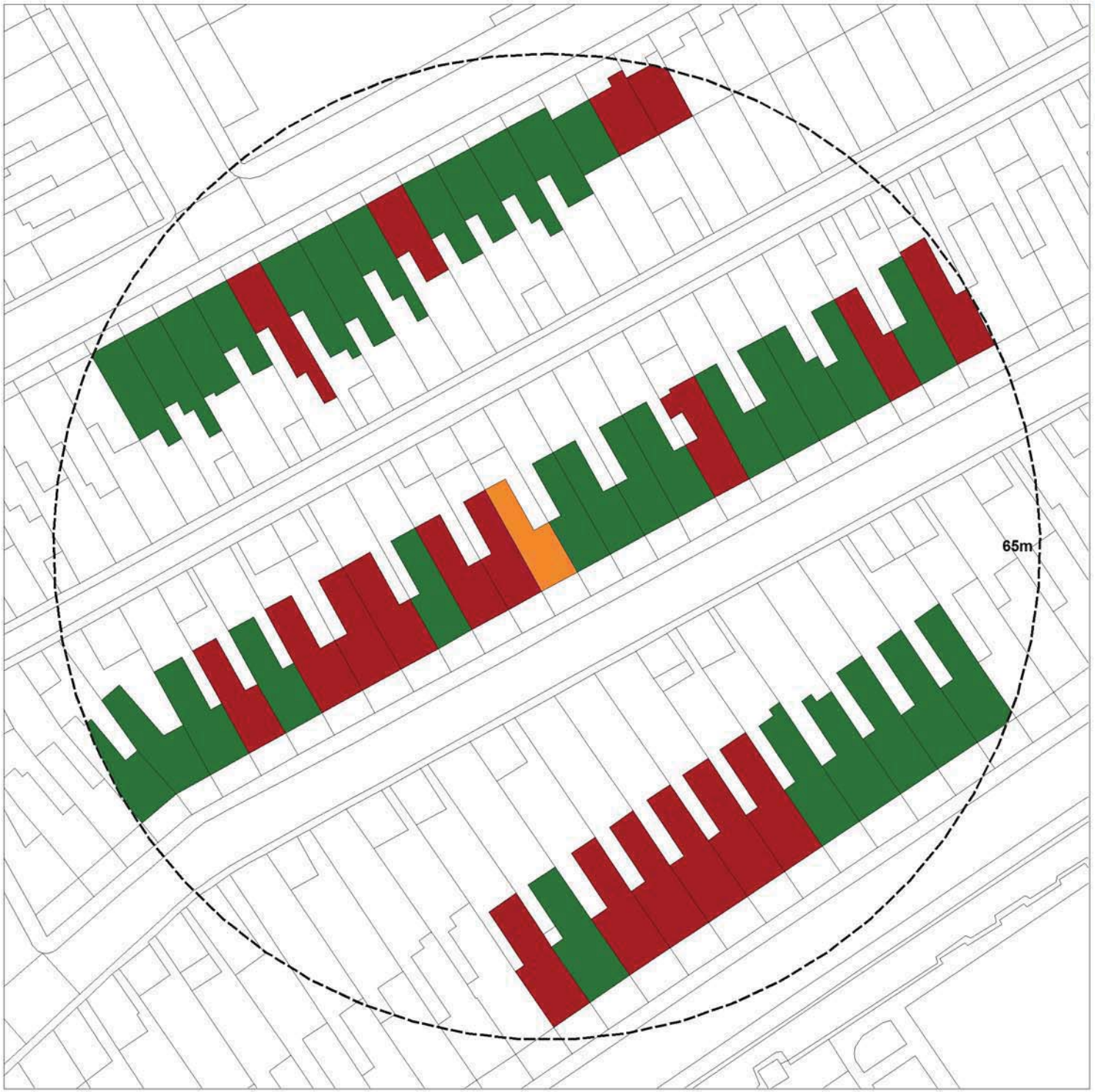
Project	Swansea HMO
Title	Licenced HMOs: Proposed 30% Threshold Area
Client	City and County of Swansea
Date	01.12.2016
Scale	-
Drawn by	MAR
Drg. No	GIS\WE\31445\01-04

N

GIS Reference: S:\WE31445 - Swansea HMO\WE31445 - Swansea HMO - Licenced HMOs - Proposed 30% Threshold Area - 01.12.2016.mxd

Appendix J: Sensitivity Testing



Proposed HMO

Other Licenced HMO
(as of 4 October 2016)

Dwelling House

52 dwelling houses
19 HMOs
37% of all dwelling houses are HMOs

Source: City & County of
Swansea Council

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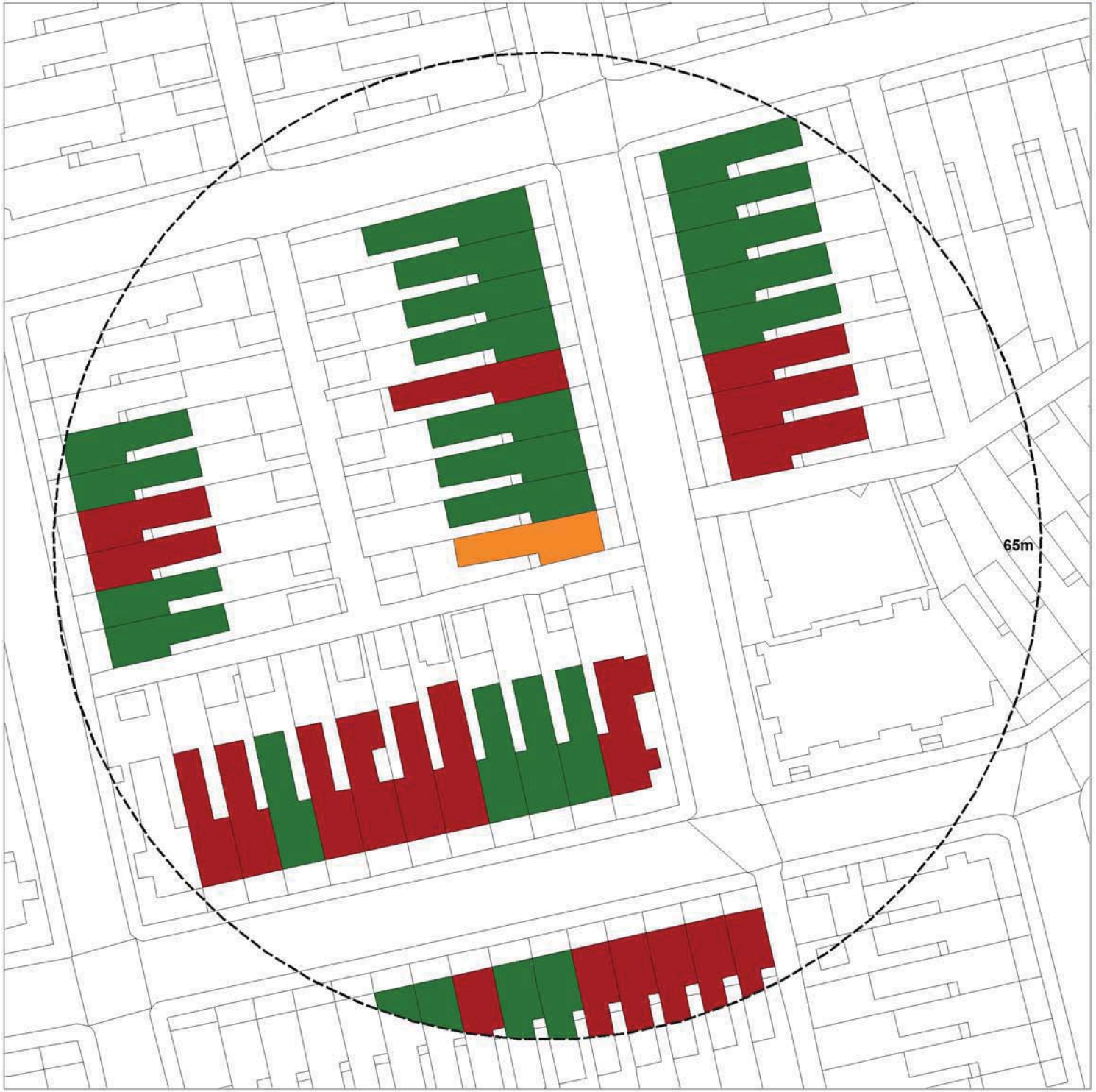

Proposed HMO

Other Licenced HMO
(as of 4 October 2016)

Dwelling House

45 dwelling houses
19 HMOs
42% of all dwelling houses are HMOs

Source: City & County of Swansea Council

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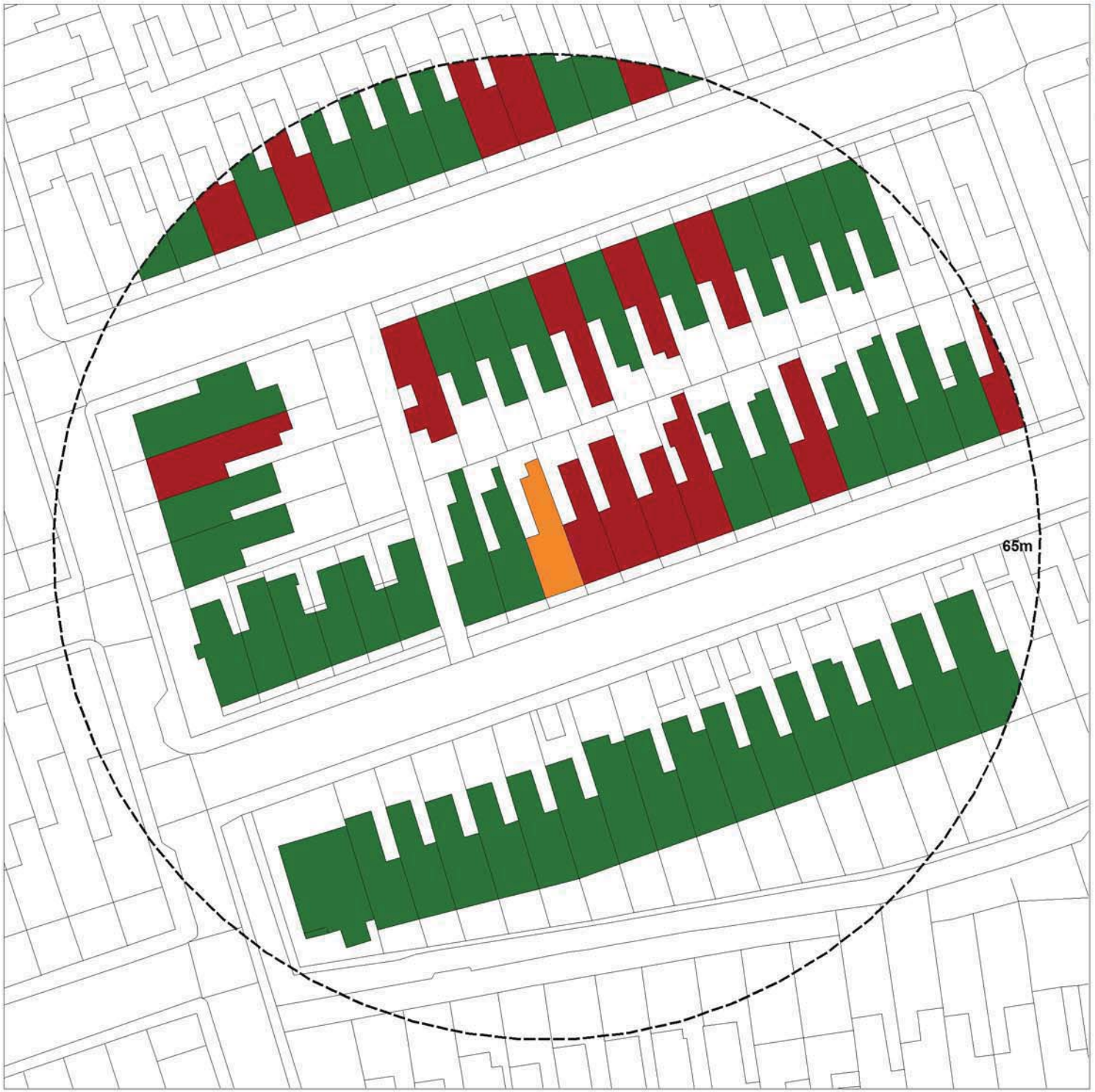

Proposed HMO

Other Licenced HMO
(as of 4 October 2016)

Dwelling House

70 dwelling houses
16 HMOs
24% of all dwelling houses are HMOs

Source: City & County of
Swansea Council

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Proposed HMO

Other Licenced HMO
(as of 4 October 2016)

Dwelling House

11 dwelling houses
5 HMOs
45% of all dwelling houses are HMOs

Source: City & County of
Swansea Council

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