

#187

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, November 02, 2017 2:11:43 PM
Last Modified: Thursday, November 02, 2017 2:21:50 PM
Time Spent: 00:10:07
IP Address: 81.98.213.10

Page 2: About you

Q1 What is your first name?

Q2 What is your last name?

Q3 Postal Address

none

Q4 Email Address - please provide a valid email address so that we can keep you updated on future consultations. If you don't have an email address we will write to you at the postal address provided.

none

Q5 Organisation (if applicable)

Portsmouth & District Private Landlords Association

Q6 If you are acting on someone else's' behalf please add your name, address and organisation name here

Respondent skipped this question

Q7 Gender

Male

Q8 How old are you?

Prefer not to say

Q9 Do you have a disability?

Prefer not to say

Q10 Ethnicity – to which of these groups do you belong?

Prefer not to say

Q11 We keep a list of individuals and organisations to keep informed on planning matters. Please use the dropdown menu below to state if you want to be included on the list. **No**

Page 3

Q12 Do you agree with the section 'Living conditions / quality of living environment'? What changes do you think we should make?

Changes imply that many properties are 'too small' for development, yet all developments meet all necessary standards for space and amenities and improve what is often, tired and dated housing stock

Most 'super HMO' developments add en-suite facilities to rooms and all meet space and facilities guidelines – so it is disingenuous for some to argue that these developments are sub-standard or provide anything other than the highest levels of accommodation available in the city today.

Q13 Do you agree with the section on 'Bedroom space standards'? What changes should we make?

Changes imply that many properties are 'too small' for development, yet all developments meet all necessary standards for space and amenities and improve what is often, tired and dated housing stock

Most 'super HMO' developments add en-suite facilities to rooms and all meet space and facilities guidelines – so it is disingenuous for some to argue that these developments are sub-standard or provide anything other than the highest levels of accommodation available in the city today.

Page 4

Q14 Do you agree with the section on 'Amenity of neighbours and local occupiers'? What changes do you think we should make?

5. Changes will delay much needed regeneration

Most regeneration of existing properties in the city is carried out by landlords in the private rented sector. Restrictions on needed developments will have an impact which will be to the detriment of the standard of housing across the city.

7. Proponents argue that without these changes, parking and rubbish issues will increase, but there is no evidence to support this

Most HMO's are occupied by tenants who have less cars per person than the average family housed in the city – so parking is not worsened by the addition of an HMO.

Similarly, rubbish issues are more a consequence of the rigid application of illogical rules in certain areas of the city than anything attributable to residents.

8. Changes will stop the creation of mixed and balanced communities

1 in 3 people in central Southsea are students (higher if you focus on voting age adults), a mixed and balanced community would reflect this. Restricting HMO's to 10% does not create a balanced mix in any way.

Students and other sharers are actually safer living in higher density areas. Crime in the city is worse where student densities are lower.

Houses in Multiple Occupation Consultation

Crime and Anti-Social behaviour in Portsmouth

The most commonly reported crimes in Portsmouth are:

1. Anti-Social Behaviour
2. Violent Crime
3. Burglary

These are the numbers of HMO's in the Portsmouth database as of January 2017: Postcode No. of HMO's Population Density HMO's per density

PO1	623	29125	0.02
PO2	202	41644	0.004
PO3	35	19843	0.001
PO4	1000	43251	0.02
PO5	1000	30287	0.03

Clearly post codes PO4 and PO5 have the greatest numbers of HMO's and the greatest HMO density. If HMO's are a problem for the city, then we should expect to find higher levels of crime in areas where the density of HMO's is greater.

This brief analysis looked at crimes reported in the month of January 2017 dating back to January 2011. The analysis looks at total crimes, anti-social behaviour and instances of violent crime. The data was gathered from www.ukcrimestats.com.

The area with the highest total crime rates was in postcode PO1 (4978). An area with 400 fewer registered HMO's when compared to PO4 (2279) and PO5 (2791).

The area with the highest levels of anti-social behaviour instances was also noted in postcode PO1 (1627). Equally the highest levels of violent crime were reported in postcode PO1 (747).

Postcode PO2 had 2508 reported instances of crime reported, despite only having 202 registered HMO's. The area with the lowest reported crime level was PO3 with 1144 crimes reported. However, it is important to note that the population density for Postcode PO3 is almost 50% less than PO4 and PO5. Where the residential density is lower, we can expect fewer crimes.

If we take into account the amount of crime numbers per residential population we can see that there are: 0.06 crimes in PO2, 0.05 crimes in PO3, 0.05 crimes in PO4 and 0.09 crimes in PO5. We can see that there is an approximate parity between postcode and the amount of crimes committed per residential population. The postcode PO1 had the highest crime rate at 0.17 crimes committed per residential population.

This analysis found no evidence that an increase in the number of HMO's in an area led to the 'break down of the social fabric.' In reality, it would seem that areas with the highest HMO densities were safer. PO5 only had 371 instances of violent crimes reported, despite there being 1000 HMO's. PO2 had 367 instances of violent crimes reported with only 202 HMO's!

Q15 Do you agree with the section on 'Other Issues to consider'? What changes do you think we should make?

Apart from points 1-4 in our original response, which we consider to be the most important on this subject, we would ask is a mixed and balanced community what local residents really want?

The aspiration is used as justification for HMO planning controls but is not the reality that people actually want to live where they are surrounded by their own kind and when young people or poor people move into their district they will dream up all sorts of objections.

Councillors want to get reelected so they support these objections but is this fair on the population and Councillors in the North of the city who cannot use planning controls to prevent what they see as an invasion into their community. It is noticeable that an application for a new HMO in say North End will see a lot more objections than one in Southsea even when taking into account that HMO residents will not object to more.

When considering the distribution of HMOs the most logical location is never considered

Houses in Multiple Occupation Consultation

When considering the distribution of HMOs the most logical location is never considered.

Waverley Road, for example, has large old houses many converted into HMOs or split into small units long ago. Is it fair on the owners of the few large single units not yet converted to be prevented from redeveloping them and attaining a fair price relative to their neighbours? Current restrictions encourage them to remain under occupied and perhaps in a poor condition. We have seen property boarded up where planning restrictions have made redevelopment unviable.

While examining HMO planning policy we would like to see some consideration being given to the trapped family residence (C3) surrounded by HMOs and thus have its value held down unfairly and forcing a family to live in a property surrounded by students. Allowing trapped C3 properties to be converted is in everyone's best interests and is a better option than creating a new HMO where few already exist.

1. These changes will most impact the poorest in our community and increase homelessness

The need for low cost single person accommodation for non-students is lost in the student issue. What about low income single people who are not students?

There is a significant need for more purpose built or adapted single person accommodation and this is going to worsen as current planned benefits changes are implemented.

One in five private landlords are now less willing to rent to young people as a result of tax increases being imposed according to new research: <https://research.rla.org.uk/report/landlord-perceptions-of-mortgage-interest-relief/>

With half of 16 to 34-year olds now living in the private rented sector, young tenants will be hit hardest by the tax changes as landlords consider moving out of the long-term rental market.

If we had more HMO's or purpose-built accommodation:

- under occupied couple appropriate accommodation (1 bed flats) would be freed up.
- Increasing availability of 1 bed flats would free up under occupied 2 bed accommodation etc.
- It would be easier to address the homelessness issue.
- Residents renting self-contained accommodation (mainly 1 bed flats) could downsize to shared or hostel type accommodation enabling them to save for a place of their own.
- Single people could be accommodated locally near their work reducing commuter congestion and parking issues.

2. Not necessary due to falling demand for student accommodation

The concerns about growing student numbers are unfounded. At present Portsmouth has 23,000 students – that makes it larger than Oxford or Cambridge and a significant proportion of students are international. Post-Brexit, it is unlikely that the proportion of international students will grow and by 2020, the numbers of UK students will have flattened due to the smaller UK population of 18 year olds compared to recent years (according to the Office for National Statistics)

These points coupled with the 4-5 thousand new student halls rooms in the city mean that concerns about students 'living in the community' are overstated and likely to diminish.

3. Increasing demand for accommodation for single people will not be met

From a study by Sheffield Hallam

"The housing crisis is set to worsen for young people already priced out of the property market as growing numbers of landlords refuse to rent to people under 35, according to research."

<http://www.independent.co.uk/news/business/news/landlords-young-people-renting-turn-away-late-payment-under-age-35-sheffield-hallam-a7871281.html>

4. Risk that changes will increase rents and make city housing even less affordable

If the demand for HMO accommodation is increased, primarily among professionals and the young non-student population and cannot be met due to changes restricting HMO development, then the reduced supply will feed through into increased rents. This

Houses in Multiple Occupation Consultation

has a knock-on effect on all rents in the city – if HMO's are expensive, people group together and look at 1 and 2 bed flats which pushes those rents up. The resultant shortage feeds through as higher rents in those properties and thus for all larger properties too.

Nationally "room" (in shared accommodation) rents went up twice the national average rent increase (excluding London) between 2016 and 2017. This must be due to supply shortages in turn due in part to increasing planning restrictions. (See note (1) at end for detail)

Q16 Are there any other changes you would like to see the final amendments?

In addition to all of the above, we would like to see recognition of the fact that we have a city University which is integrated with the community and if it is to succeed, that integration needs to be encouraged and fostered – not shunned and resisted. Forcing students into expensive (and often poor quality) halls results in them:

- o coming out with higher debts
- o missing out on the learning experience of sharing a house
- o and struggling to make the transition from child to responsible adult

(1)

Room Rents going up twice the national average

Average monthly room rent (£) Q1 2017 £443

Annual change Q1 2017 vs Q1 2016 (%) 6% (£417)

UK excluding London Annual change Q1 2017 vs Q1 2016 (%) 3%

Please accept this input to the consultation on the proposed changes to the SPD on PCS20 on behalf of the members of the Portsmouth & District Private Landlords Association.

Summary

The PDPLA believe the proposed changes to HMO planning regulations are unnecessary and will be counter-productive. The reasons we believe this to be the case are:

1. These changes will most impact the poorest in our community and increase homelessness
 2. Changes are not necessary due to falling demand for student accommodation
 3. Increasing demand for accommodation for single people will not be met
 4. There is a risk that these changes will increase rents and make city housing even less affordable
 5. Changes will delay much needed regeneration
 6. Changes imply that many properties are 'too small' for development, yet all developments meet all necessary standards for space and amenities and improve what is often, tired and dated housing stock
 7. Proponents argue that without these changes, parking and rubbish issues will increase, but there is no evidence to support this
 8. These changes will stop the creation of mixed and balanced communities
-