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Page 2: About you

Q1 What is your first name?

Q2 What is your last name?

Q3 Postal Address

Estates and Campus Services, Floor 6 Mercantile House, Hampshire Terrace, P01 2EG

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)

University of Portsmouth

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

Female

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**

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

The University supports the need to protect the amenity of future residents and the provision of a good standard of living environment for future occupiers, ensuring high quality accommodation is provided for its students across the City.

The need for all applications to be supported by a full set of floor plans with internal measurements and room specifications (i.e. double or single bedroom) goes beyond national planning validation requirements. This could overburden an Applicant with the need for detailed architectural plans for all proposals which are not typically readily available for existing housing stock.

An appropriate balance needs to be struck when validating Applications. In our view, provided the layout plan can demonstrate how space standards can be met this is entirely sufficient for both validation and determination.

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

Paragraph 1.17 of the Consultation SPD acknowledges that the National Described Space Standards relate to new dwellings, however the Council nevertheless still require bedrooms in HMO proposals to comply with these standards for bedroom accommodation at paragraphs 1.19 and 1.20.

The Housing Act (2004) and statutory guidance sets the minimum suitable bedroom size as 10 sq.m for a double bedroom for two persons and 6.5 sq.m or above as suitable for a single bedroom for 1 person. These standards are used in adopted HMO standards nationally and should also be applied by Portsmouth City Council as more appropriate for assessing applications for existing housing stock to become HMOs. No justification has been provided for the slightly higher minimum room size proposed in the consultation

document. If these were applied, the SPD would also accord with the Council's Housing Standards document 'Standards for Houses of Multiple Occupation' (May 2014), which we assume is the source of the amenity space standards detailed at page 9 of the document, however this should be clarified in the final revised document.

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

The University have no comments on the amendments made to paragraphs 1.23 -1.34 of the SPD as they strive to provide the highest standards of accommodation to ensure properties are not overly intensified. To further respect the amenity of neighbours and local occupiers the University's Student and Neighbour Liaison Service runs initiatives to ensure Students are good neighbours and responsible citizens whilst studying in the City.

Houses in Multiple Occupation Consultation

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

We have no comments to make in relation to paragraph 1.35 of the Revised SPD, as this relates to HMO Licenses and civil penalties which are covered by separate legislation detailed in the Housing and Planning Act (2016) which are beyond the scope of the Planning system.

Houses in Multiple Occupation Consultation

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

At this time, we have no further comments to make on this Consultation Document, however we reserve the right to comment again during possible future rounds of consultation in relation to revisions to the SPD.

The University of Portsmouth welcomes the opportunity to comment on the proposed revisions to the Houses in Multiple Occupation (HMOs) SPD (September 2017).

The University's Position

The University has a significant economic, social and environmental footprint in the City, Region and beyond. This includes a population of more than 25,000 students and 2,500 full-time equivalent staff. The population includes more than 5,000 international and EU students from almost 150 different countries.

The supply of appropriate accommodation is an important element of the University and indeed City's ability to accommodate students. The quality and location of accommodation also has a direct influence on our student's experience and contribution. HMOs form an important and vital role in the City's housing stock for students and allow them to choose from a diverse and affordable range of accommodation. This is an important aspect of the local housing market for students who choose not to live in managed student accommodation.

The provision of appropriately located and designed accommodation can ensure that students have a positive economic and social impact on the City together with the reputation and attraction of both the University and City. The University strives to guide property owners and developers on the location and standard of their proposed accommodation to meet our in-depth understanding of our students' requirements. This includes HMOs. Such an approach is entirely in accordance with the objectives of Portsmouth Plan Policies PCS19 and 20 (including paragraph 5.29).

Policy Justification for an updated SPD

According to the NPPF and PPG, SPDs should only be used where clearly justified and build upon and provide more detailed advice or guidance on the policies in the Local Plan.

In the case of this SPD, it relates to Policy PCS20 'Houses in Multiple Occupation (HMOs): Ensuring Mixed and Balanced Community' of the Portsmouth Plan (adopted September 2012) and the original SPD was adopted shortly after the Local Plan in October 2012. SPDs should be used where they can help Applicants make successful planning applications and not add unnecessarily to the financial burdens on development (paragraph 153).

The University welcomes the principle of the SPD and how the City Council has recognised the importance of keeping it up-to-date. The City is encouraged to review all other SPDs to ensure they remain up-to-date and justified whilst the Local Plan Review is being prepared.

Conclusion & Next Steps

We hope this letter provides a clear overview of our concerns regarding new HMO accommodation in the City. We consider greater clarification on the proposed bedroom and amenity space standards is justified to address the issues we have identified and to ensure the document is consistent with the Council's 'Standards for Houses of Multiple Occupation' (May 2014). We would welcome a meeting with you to explore the issues raised in this letter further and to agree a way forward.