

## Houses in Multiple Occupation– Supplementary Planning Document (SPD)

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Report on consultation responses to the proposed revisions to the January 2018 SPD

## 1. Introduction

- 1.1 This report details the findings of the consultation on the proposed amendments to the Houses in Multiple Occupation Supplementary Planning Document (SPD) - adopted January 2018. The SPD sets out how the City Council aims to prevent the high concentration of HMOs in the future and ensure that our communities are mixed, balanced and sustainable and that there is a range of accommodation across the city to meet different housing needs.
- 1.2 Following a period of consultation in September 2017 the Council adopted changes to the Houses in Multiple Occupation Supplementary Planning Document in November 2017. During the September 2017 period of consultation it was suggested that the Council considers the local impacts of rows of HMOs and the impact of being "sandwiched" between HMOs.
- 1.3 The Council therefore undertook an additional round of consultation in which responses were sought on the issues of preventing three or more HMOs in a row; "sandwiching" between HMOs, and allowing change of use for properties that had already become "sandwiched".
- 1.4 The purpose of this report is to outline the findings of the consultation.

## 2. Consultation process

- 2.1 Consultation on the Houses in Multiple Occupation Supplementary Planning Document – January 2018 was carried out from Monday 5<sup>th</sup> February 2018 to Monday 19<sup>th</sup> March 2018. The draft document was made available on the city council's website and printed copies were made available at the Civic Offices as well as at all libraries in the city. Comments were invited by post and email.
- 2.2 Publicity and promotion was undertaken via the council's website and local mailing lists. This included a letter / e-mail sent to known local residents groups and professional associations, statutory consultees as well as others who had registered their interest in participating in consultation on any planning related documents and those who had submitted consultation responses to previous consultations on the HMO SPD.

## 3. Responses to the proposed amendments

- 3.1 The council received 47 responses; three on behalf of organisations (Portsmouth Society, East St Thomas Residents Association and Portsmouth & District Landlords Association), and 44 from individuals. Table 1 details the comments received.

## 4. Summary

- 4.1 In response to the question "Do you agree with the proposed changes to normally prevent three or more HMOs in a row?" the following responses were received from 39 respondents: 77% yes; 15% no; and 8% not sure.

- 4.2 In response to the question "Do you agree with the proposed changes to prevent a non-HMO from being 'sandwiched' between two HMO properties?" the following responses were received from 39 respondents: 90% yes; 5% no; and 5% not sure.
- 4.3 In response to the question "Do you agree with the proposed changes to allow, in circumstances that a property is already 'sandwiched', for the property to be considered for an HMO use?" the following responses were received for 39 respondents: 31% yes; 49% no; and 20% not sure.

## 5. Conclusions

- 5.1 The consultation responses shows strong support for the proposals to normally prevent three or more HMOs in a row and to prevent non-HMOs from becoming sandwiched between two HMO properties. However there was a more mixed response to the proposal to allow, in circumstances that a property is already sandwiched, for the property to be considered for HMO use.
- 5.2 The responses to this consultation should be presented to the Cabinet Member for Planning, Regeneration and Economic Development for consideration by the committee.

**Table 1: Summary table of comments and responses**

ID	Do you agree with the proposed changes to normally prevent three or more HMOs in a row?	Why?
East St Thomas Residents Forum	Yes	1.22a Implementation of Policy PSC23. As outlined above, we are highly supportive of the proposals to prevent sandwiching and 3 in a row developments. Most family households which become “sandwiched” between student HMOs have experienced a major impact on their amenity. As such we are highly supportive of these restrictions being imposed irrelevant of the HMO density in the area. We would however like to see clarification in the drafting that HMO applications which sought to further sandwich a property (e.g. a planning application to turn a C4 HMO – C3 Dwellinghouse – sui generis HMO sandwich into a sui generis HMO – C3 Dwellinghouse – sui generis HMO sandwich) would also not be permitted.
I001	Not Sure	From experience as living as a non HMO in an area where the rules about overall occupancy have not been adhered to, it seems most important that non HMOs do not have a concentration of HMOs around them.
I003	Yes	Three in a row would swamp an area and severely impact upon local resources and character of are
I004	Yes	We are currently living sandwiched between 2 HMOS WHICH IS A LIVING HELL
I005	Yes	HMOs present a greater strain on resources and amenities than family houses
I006	Yes	My family's home is currently 'sandwiched' between two HMO - we have one directly opposite as well as a further four in the Road (at least). I have to say we have been lucky with our neighbours so far as the majority were young professionals, but that is changing. There are two HMO properties next to each other further down the road and there is constantly excessive rubbish and noise from both.

Portsmouth & District Private Landlords Association	No	<p>1.22b However, there is a particular concern in existing cases where residential properties (C3 use) are already 'sandwiched'. In those instances, and where, a community is not already 'imbalanced' by existing HMO uses permission will be granted for the 'sandwiched' C3 property to go to HMO use providing the new use would not lead to an imbalanced community in that area. Not permitting a C3 property already 'sandwiched' between two HMOs to be used as an HMO is grossly unfair on the owner. If one believes this negative impact of proximity to HMOs then PCC are forcing a family to live in this condition. What is more the value of a C3 property is less than a C4 and a 'sandwiched' one worth even less when the owner comes to sell. We ask for this exception to be given to already sandwiched C3 properties regardless of the current density. As an example, there is a terrace of 4 houses in River Street standing alone from all other housing. Three of these properties are HMO's and the 4th is a private residence. As things stand, the old gent living in the 4th property is sandwiched and cannot sell at anything like market price, so he is trapped there. If the rules allowed this property to be converted to an HMO he could sell at a premium price, a new HMO would be created where no one would complain and everyone involved would be happy. More generally where HMO density is low it would seem more sensible to allow 3 in a row as only one property has an HMO neighbour. New HMOs have to be created somewhere and 3 in a row seems more sensible than more equal distribution where more people have to have HMOs as neighbours.</p>
I007	No	HMO's are not always students. I am a young working professional that can't afford to buy. My housemate and I cause no problems to the properties around us, nor would a third party.
I008	Yes	Because there are too many HMO's
I009	Not Sure	There is an argument that they might be better concentrated in one area where their effect is less significant on family homes. My personal experience is that they are less cared for and maintained.
I010	Yes	
I011	Yes	

I012	Yes	They are disruptive to local community cohesion, lead to poor property maintenance and lower surrounding house prices. I think increased crime where blocks of these properties are - eg Waverly Rd
I013	No	I think the proposal should be MORE limiting to HMO's - 3 in a row would be dreadful for the people living opposite
I014	No	None of these changes considers the impact to parking which is already a very contentious issue in the city.
I017	Yes	I think it important to get the balance right between HMO and private Home ownership. However, no real community if too many HMO's. Parking is an issue: houses aren't necessarily looked after: noise level can be a real issue
I018	Yes	I hope it will reduce the number of HMOs being granted.
I019	Yes	There are too many HMO's popping up everywhere and the extra people packed into one space affects traffic, it affects parking and Portsmouth just doesn't have the space or infrastructure to deal with it all. You also never know who your neighbours are as people are constantly coming and going and that can be quite unnerving.
I020	Yes	There is a disproportionate number of HMO properties and when that is considered alongside the number of houses also split into flats or bedsits, it impacts on the properties which remain as family homes
I021	Yes	Due to a lack of vehicle restrictions, this would help reduce the lack of parking space in the roads.
I022	Yes	Residential streets are choked by too many HMOs and any measure to curb their expansion has got to be good.
I023	Yes	HMOs are ruining the composition of residential areas and need to be cut back
I025	Yes	I agree with this change as it reduces areas becoming highly concentrated with HMO's. High concentrations of HMO's lead to several issues in Southsea, including parking problems, anti-social behaviour issues, noise issues and so on
I026	Yes	Areas of Portsmouth are losing the ability to socialise, park and benefit families because of the sheer number of HMOs being granted planning permission. Rarely can I go out in my car after 6pm - I just won't get parking. I cannot find a home to buy that comfortably fits a family of 6 - they're all converted to HMO's. We barely know neighbours now because of the transient nature of HMO's and have made police reports because of possible drug selling in the HMO opposite our house.

The Portsmouth Society	Yes	It provides greater clarification
I028	Yes	We need less student accommodation, there should be more houses available for families, we have lost that community feeling
I029	Yes	
I030	Yes	Creates too much potential for unsociable disturbance.
I032	Yes	I live next to a student HMO and have first hand experience of having 9 students living next door. Students do not understand the needs of local residents/families and if I were sandwiched between two HMO properties it would make life extremely difficult
I033	Yes	
I034	Yes	Too many HMOs already in a cramped city like Portsmouth
I035	Yes	I think they will help.
I036	Yes	The proposed amendments will help to maintain a healthy balance of property types within communities.
I038	Yes	I have seen my friends lose value on their property and generally having a miserable time in areas where there is a high saturation of hmo properties.
I040	No	HMOS are needed in this city - stop trying to interfere and let market force direct.

		<p>Question 13 above, deals with room sizes, toilet facilities etc... for HMOs. Amenity and Room Sizes:- The dimensions seem very small for adults, almost like the dimensions of a prison cell. The occupiers of the rooms would have very little room to breath, let a loan study. Amenity of neighbours and local occupiers:- Yet again, buzz words, but what does "High quality Design" and "Good Standard of amenity" mean when put into practice? for example, is a bedroom of 7.5 meters squared, really enough space for a single bed, wardrobe, work/study area, places to store everyday items etc... or is this where "High Quality Design" makes an entrance? 1.21a and 1.21b:- Good words indeed, but very hard to put into practice, for example, the growth in HMOs in my area (PO4 0BB) means that it is impossible to park ones vehicle, near ones home. The Streets in this area are always filthy, and the HMO houses, are looking unloved, neglected (Dos houses) which has a knock on effect of devaluing C3 homes in the area. (Section 1.21 talks of 'Protecting the living environment of the residents', However, with no one to police and enforce section 1.21, the exact opposite of section 1.21 is achieved.) HMOs have a negative effect on the surrounding properties and areas they are located in. At the moment, HMOs house a large number of young adults, normally Students, but, as University and Councils build more and more student accommodation, then HMOs will become the sort after accommodation for those who just need a room, rather than a house to live in. Placing up to six unrelated people in properties that were designed for two adults, and two children, has a real negative effect on 1:- Parking in that area. 2:- The areas environment (Examples include excess rubbish. Abandoned Bicycles/Skateboards. Fly Tipping. Tenants using there forecourts as Waste Tips - The list goes on and on) 3:- The local Services (Street cleaning. Rubbish Collection etc...).</p>
I041	Not Sure	
I043	Yes	I agree with new paragraph 1.22a - it is important to protect residents not living in HMOs from being 'overwhelmed' by HMOs in their area.
I044	No	Amendments do not go far enough



ID	Do you agree with the proposed changes to prevent a non-HMO from being 'sandwiched' between two HMO properties?	Why?
East St Thomas Residents Forum	Yes	1.22a Implementation of Policy PSC23. As outlined above, we are highly supportive of the proposals to prevent sandwiching and 3 in a row developments. Most family households which become “sandwiched” between student HMOs have experienced a major impact on their amenity. As such we are highly supportive of these restrictions being imposed irrelevant of the HMO density in the area. We would however like to see clarification in the drafting that HMO applications which sought to further sandwich a property (e.g. a planning application to turn a C4 HMO – C3 Dwellinghouse – sui generis HMO sandwich into a sui generis HMO – C3 Dwellinghouse – sui generis HMO sandwich) would also not be permitted.
I001	Yes	I agree that a non HMO should not be squeezed between two HMOs (as in my case). Not sure how the proposal that the existing non HMO property should have the option to be HMO in this case doesn't contradict the earlier proposal for no more than 3 HMOs in a row? There is a difference in HMOs and impact on refuse/noise/balance - those for student use and for professional sharing. Perhaps more should be done to consider this balance in the proposals?
I003	Yes	As in 15, this would create three in a row. Too many.
I004	Yes	Portsmouth residents should not have to put up with living in these situations, as we have been doing for many years sandwiched between 2 HMOS that PCC have allowed. We as working tax payers must be given equal rights to rent out our property and move to a location out of this city were we are able to live in peace undisturbed daily and more importantly nightly by student partying and noise pollution.
I005	Yes	There is potential for noise disturbance from either side

I006	Yes	Because my family home is currently 'sandwiched'. The turnover of people in the properties is quite high and while most are respectful of us having a young family, not everyone is. Additionally I worry this will impact on our ability to sell our property in the future should we decide to.
Portsmouth & District Private Landlords Association	Yes	
I007	Yes	
I008	Yes	Neighbour disputes more likely to happen
I009	Yes	Portsmouth old houses are not built with decent soundproofing between terraced houses and it causes noise problems as people 'live' in bedrooms even if a joint room is available. To have this on both sides would cause even greater noise issues.. Residents are so transient that it is impossible to complain about their behaviour with sufficient evidence before they have moved on. To have this both sides of a family home would create problems. The streets are not adequate to allow for one car per house, HMO's could bring multiple cars adding to the parking issues where they are close together. (I speak from personal experience.)
I010	Yes	Parking, noise
I011	Yes	
I012	Yes	Would reduce price of sandwiched house
I013	Yes	Its bad enough living NEAR one! Being sandwiched between 2 would be awful.
I014	No	It doesn't go far enough. It should be impossible for a house to be sandwiched.
I017	Yes	Having been 'sandwiched' between HMO's it is not great. Noise level could be dreadful. Parking a massive issue if five people in each house all own cars! We looked after our property but either side could look shabby
I018	Yes	I imagine it would be uncomfortable being sandwiched between two properties of this type.
I019	Yes	I would hate to be sandwiched between two HMO's, houses packed with lots of people are noisy and often have people coming and going at all hours.
I020	Yes	

I021	Yes	Due to a likely increase in noise from an HMO this is considerate. A normal single occupancy house should not be sandwiched. It's arguable that a terraced single occupancy house should not have an HMO attached to it at all.
I022	Yes	As before – parking, noise and untidiness can be problems associated with HMOs in residential streets.
I023	Yes	Living near HMOs is an absolute nightmare. Parking is impossible and in my experience the tenants do not care about the area and leave rubbish everywhere.
I025	Yes	I agree. HMO's increases the risk of noisy neighbours and anti-social behaviour, and contribute to the already terrible parking conditions in Southsea. To live sandwiched between two HMO's would be very stressful and not good for neighbourly relations.
I026	Yes	As above - if you want to lose the Portsmouth community feeling you'll allow more HMO's. If you don't want to lose a sense of community you'll focus on families, not individuals renting a horridly small room that used to be a lounge.
The Portsmouth Society	Yes	It seems to be a reasonable and fair rule for all parties
I028	Yes	more students together, makes more noise and rubbish
I029	Yes	
I030	Yes	Can feel secluded from a family neighbourhood feel
I032	Yes	experience of having 9 students living next door. Students do not understand the needs of local residents/families and if I were sandwiched between two HMO properties it would make life extremely difficult
I033	Yes	
I034	Yes	
I035	Yes	Helpful.
I036	Yes	Excessive noise pollution from HMO can be detrimental to other residents. This problem would be exacerbated by being sandwiched between two HMOs.
I038	Yes	The risk of having loud and disruptive neighbours doubles. Also i believe that having a true sense of community spirit and support that can be achieved via neighbours can improve mental health, help older people etc. This is more likely when neighbours are given time to get to know one another, rarely achieved with transient nature of students.

I039		
I040	No	HMOS are needed in this city - stop trying to interfere and let market force direct.
I041	Not Sure	I believe the proposed changes to the policy would encourage Landlords, and those that wish to become HMO owners, to actively seek out properties that are sandwiched between two adjoining HMOs (Such as the property I currently own), thus bringing more HMOs to areas that are already over-populated with HMOs.
I042	Not Sure	
I043	Yes	I agree with new paragraph 1.22a - it is important to protect residents not living in HMOs from being 'overwhelmed' by HMOs in their area, particularly if it is proposed that HMOs be on both sides of a non-HMO.
I044	Yes	Measures need to be taken to protect residents' rights for access and noise and other disturbances

ID	Do you agree with the proposed changes to allow, in the circumstances that a property is already 'sandwiched', for the property to be considered for an HMO use?	Why?
East St Thomas Residents Forum	Not Sure	
I001	Yes	See previous answer
I003	No	We need to get back to a lower ratio. This would be three in a row by the back door. We need to reduce not increase numbers of HMOs.
I004	Yes	I am living in in this situation and it is causing stress and upset on a daily basis impacting on myself and my partners health as we are currently constantly being disturbed by HMO residents.
I005	Yes	My objection about noise issues would not apply
I006	Not Sure	I really don't know how I feel about this - obviously if we were selling our property and the only buyer interested was someone wanting to change the property to a HMO dwelling I would probably be in favour, but I don't think our neighbours would have the same opinion without the vested interest.

Portsmouth & District Private Landlords Association	No	No it should not be restricted even where the HMO density is high for the above reasons We would like to take the opportunity to remind decision makers that new HMOs are required. Government policy affecting landlords means many are being sold out of HMO use. While there is a perception that they are only required by students and young single people, relationships breakdown and Portsmouth has to cater for a large transient workforce. If 3 locum doctors or contract workers on the new carriers want to share an ordinary house it has to have planning permission first and may need a licence. There are very few of these sitting empty and perhaps none with landlords prepared to shift from their student business model. By putting so many obstacles in the way of those wishing to meet this demand PCC may be pleasing the family residents and certain councillors but it must be hampering the economy of the city.
I007	Yes	
I008	No	We need to stop these HMO's and they should either be converted back into houses or self-contained flats, example Ashburton Road
I009	Not Sure	This could ultimately lead to a row of many where you have already allowed too many HMO's before rules were tightened. However for the house owner sandwiched between it is a nightmare. The fact that you are raising the issues implies you are aware that HMO's create problems for house owners.
I010	Not Sure	
I011	No	No way to having 3 in a row!!!
I012	Yes	Well otherwise who is going to want to live there. Better to avoid though
I013	No	That would allow 3 in a row - hell for the other neighbours
I014	No	This has a gravely negative impact on parking and the overall value of the street.
I017	No	Because you'd have three in a row. What needs to be considered is less HMO's in certain areas
I018	Yes	It makes sense, how ever further consideration to parking and maximum numbers of HMOs in one street should be included.
I019	No	I would feel bad for the persona sandwiched but I also want to see an end, or at least a dramatic decrease in HMO's popping up everywhere so I would not want sandwiching to be used and abused as a way to get more HMOs in the city.
I020	No	

I021	No	Too many cars. Too much noise. Too much potential for structural integrity to be compromised in older properties.
I022	Yes	As above.
I023	Not Sure	I do not like the idea of more HMOs.
I025	No	I disagree. This just sounds like a "get out" clause for landlords to buy about property in certain areas to get away with having more HMO's.
I026	No	You just contradict your own planning if you allow the mistakes of previous applications granted to decide new ones - would you like to live on a Portsmouth street opposite 3 HMO's with a potential of 42 different occupants (2 per bedroom, 7 bedrooms - typical application made in Copnor at the moment) and 42 different vehicles on the road?
The Portsmouth Society	Yes	All the parties should already be aware of the issues
I028	No	same reason as question 16
I029	No	
I030	No	Same reason as answer 14
I032	No	Because of the extensive applications from C4 only to C3/C4 therefore these HMO Properties may not be in continual use as HMO
I033	Not Sure	
I034	Yes	
I035	Yes	Will help
I036	Yes	
I038	Not Sure	The question confused me
I040	Yes	HMOS are needed in this city - stop trying to interfere and let market force direct.

I041	Not Sure	Section 1.22b:- I always thought the idea was to reduce the amount of HMOs in areas with high HMO properties, yet this section will encourage Landlords and Home owners to seek out C3s that are sandwiched between HMOs, thus leading to more HMOs in an area which has a large number of HMOs. It's has already been reported that the PO4 0BB area, has the lowest number of owner occupiers in the Portsmouth area, and, as a resident of the PO4 0BB area, it saddens me to think that, whilst the council have good intentions, the results of those intentions, always seem to go in the landlords favour. If you wish to reduce the HMOs in areas which are heavily populated with HMOs, then
I042	No	
I043	No	I disagree with paragraph 1.22b - this seeks to allow to HMOs to sandwich a residential property, thereby going against the principle in paragraph 1.22a. Residents should not be put in the position of having an HMO on both sides of their residence, regardless of whether there is an 'imbalance' or not.
I044	No	Unable to see a difference between these and other properties.

ID	Do you have any additional comments?
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East St  
Thomas  
Residents  
Forum

Since the last update of SPD20 in November 2017, we have seen some reduction in the pace of HMO development in the East St Thomas area; a change which has been welcomed by our members. Despite this, we do still see actions, applications and appeals from developers who continue to push the boundaries of the planning framework, trying to add further HMO bedrooms into the East St Thomas area, which because of the already exceptionally high density of HMO properties, further imbalances and reduces the sustainability of our community. During the 2017 consultation which primarily sought to close the loophole which allowed the uncontrolled increase of sui generis HMO property intensification, ESTRF requested that PCC introduce restrictions on HMOs "sandwiching" residential properties and "3 in a row" HMO developments, similar to those implemented by other UK councils who face similar issues with HMOs. As such, ESTRF is highly supportive of the recent proposals, although we would like to raise some additional points for clarification and consideration. Just to reiterate a point we made during the 2017 SPD20 consultation process, members of ESTRF are not anti-HMO or anti-student – it's just that we know from our own personal experience, there needs to be a robust set of policy measures to prevent the continuous over-densification and over-intensification of HMOs by developers in any one area. Specific Points on the current draft revisions:

- 1.18 and 1.19 Bedroom Space Standards. We are pleased to see that there are no proposals to change the minimum rooms sizes of 7.5m<sup>2</sup> (single) and 11.5m<sup>2</sup> (double) for an HMO bedroom. We see these limits as an important element of providing high quality accommodation for current and future residents.
- 1.21d Implementation of Policy PCS23. As a local residents' forum, we carefully monitor HMO planning applications in our area. In a significant number of cases, submitted plans provide very low levels of detail and appear deliberately vague regarding the nature of the accommodation being provided. We support the need for detailed, fully dimensioned floorplans to accompany each HMO application, as this level of detail is required to ensure that the aims of PCS23 are being met.
- 1.22a Implementation of Policy PSC23. As outlined above, we are highly supportive of the proposals to prevent sandwiching and 3 in a row developments. Most family households which become "sandwiched" between student HMOs have experienced a major impact on their amenity.

As such we are highly supportive of these restrictions being imposed irrelevant of the HMO density in the area. We would however like to see clarification in the drafting that HMO applications which sought to further sandwich a property (e.g. a planning application to turn a C4 HMO – C3 Dwellinghouse – sui generis HMO sandwich into a sui generis HMO – C3 Dwellinghouse – sui generis HMO sandwich) would also not be permitted. Additional points for consideration:

- Rebalancing Communities We continue to make reference to PCC's documented research that the number of people who will require larger, family sized properties is increasing and the Council's aim 'to avoid high concentrations of HMOs in the city, and to ensure the future provision of mixed and balanced communities'. Given that almost all the HMO properties in the East St. Thomas area have been specifically converted/developed to maximise the number of study bedrooms for student use, we continue to lobby the Council to support the approval and development of large purpose-built student halls of residence in the city centre which will ultimately reduce the financial attractiveness of taking family homes and converting them to student HMOs. We also welcome the fact that PCC has confirmed that there will be no change in the minimum room sizes introduced in the last consultation. We see this as important in ensuring high quality developments, with the potential of attracting young sharing professionals to the area.

- Process streamlining: Despite the wide general dissemination of the HMO planning guidance in SPD20 to landlord and developer associations, there are still applications coming into the planning system which have no chance of approval based on the 10% rule for both C4 and sui generis HMO development. Whilst we are clear that there is no requirement for applicants to seek pre-application advice and that the Council must assess all planning applications submitted to it, precious Council resources are being consumed processing and assessing essentially futile applications. In order to help stem this pointless waste of Council time, we would like to see a small modification to the Planning Application form so that it expressly states that for all applications to create or extend an HMO, there is a prescribed 10% cap on the HMO density within a 50M radius of the application site and applicants should seek to confirm that their application does not breach these limits prior to submission.
- Robust policy drafting: It is clear that developers in search of increased profits will look for further loopholes in the policies restricting HMO development. Over the last few months we have seen applications from developers looking to knock two adjacent terraced HMOs into one and another claiming that their property is not an HMO, and is actually a student hall of residence. This relentless creativity by developers continues to challenge the drafting, spirit and intent of the HMO planning framework and we would urge the council to complete an urgent review of all policy documents in this area to confirm that they are fit for purpose.
- Alignment between planning and licencing: We have long made the point that there is a fundamental disconnect between the planning and licencing processes which manage HMOs. The current situation where the PCC licencing team can process an application (frequently involving a site visit) for an HMO licence when the property has no prospect of obtaining the required planning permission for use as an HMO continues much to our disbelief. While we realise that applications for HMO licences and planning are completely separate processes, we believe there needs to be a step-change in the interaction between Planning and Licencing Departments to reduce confusion for developers and residents, and again to prevent the wanton waste of PCC resources.

	<p>During the 3Q 2017 consultation on SPD20 and planning committee meetings, we were told by the Director of Planning that a piece of work was underway to align the data and processes from PCC Planning and Licencing which relate to HMOs and that this work was due to complete in “early 2018”. Our understanding is that this has still not been completed, and to avoid further waste of council resources, we would urge PCC to bring this to a conclusion as soon as possible.</p> <p>- Transparency During the PRED meeting to approve the November 2017 revision of SPD 20, the council leader noted that, in a similar way to other councils, details of all HMO licences should be freely available online, and a commitment was again made to implement this system in Portsmouth by “early 2018”. We believe this transparency would be a huge help to both residents and developers and request an update on when this system will be available. Conclusion ESTRF is very supportive of the proposed additions to SPD 20 to restrict sandwiching and “3 in a row” developments. In addition, the revisions should also help raise the bar and encourage only high quality HMO developments, whilst helping maintain the now scarce family housing stock in the area. Martin Willoughby On behalf of the over 128 members of East St Thomas Residents Forum</p>
I001	It is critical to the success of any proposals to support better balanced community for licensing and planning considerations to be properly linked up. For example the licence for HMO to be removed at the point of sale of a property in areas where the saturation of HMO is in excess of recommended level.
I003	Three in a row is saturation and is a disaster for houses nearby. I recently saw what might be described as a archetypal granny coming out of her house in Southsea; a house next to two student HMOs. What a way to spend her twilight years.
I004	Yes ,if I can be of further help in this matter PLEASE feel free to contact me
I005	HMOs in general place a strain on resources and amenities, and make general housing less affordable for many people
I006	I understand there is a chronic housing shortage in Portsmouth and HMO provide a cheaper, quicker solution to this for a certain sector of the population. However I feel the number of HMOs allowed in a road is ridiculous - parking, anti social noise nuisance and excessive rubbish are just a few of the issues exacerbated by excessive numbers of people living in one road

Portsmouth & District Private Landlords Association	A fallacy that councilors need to understand is the belief that all of this new student housing being built around the town station will free up hundreds of houses in Southsea which are currently HMO's. The issue here is that councilors have allowed a 'one size fits all' premium solution to be built in vast numbers even against the Universities advice. Yes, we need purpose built student accommodation but premium studio and 5/6 person communal solutions at upwards of £200 per week are only affordable for a small proportion of students. The rest will continue to spend half on rent as much living happily and comfortably in the community in HMO's in Southsea.
I009	Young people and families are being pushed out of the housing market in the area as people buy properties to convert to HMO or rent out. Older people in my street say it all used to be owner occupier but there are now many rented out. Definitely need a strict limit on the overall number and placing of these.
I011	Parking is hideous in Copnor. Why would you want to add to this problem??
I012	Landlords should have to maintain the property's to higher standards. On my road the HMOs look a mess compared to the family homes. But we do still need accommodation for individuals. Waverly road is just a mess.
I013	HMO's are not conducive to quiet family residential streets.
I014	HMOs need to be limited to one per street block maximum. They are a disgusting way for landlords to profit on sub standard living and the council should not allow it.
I017	How are HMO's checked? I'm fairly sure that there are more in certain areas than there are supposed to be. No issue with HMO's. Lived in one as a student but they need to show more respect for house owners and their properties Many thanks
I018	Additional thought is needed around parking for these HMOs. Proposals should come alongside a parking review in the area that allows for the additional vehicles. There should also be a limit to the number of HMOs in one given area.
I021	Stop turning terraced houses into HMO. There is a breaking point and potential for over saturation with regards to cars, parking and noise.
I022	HMOs obviously add to parking problems on city streets, but multiple car ownership also needs to be tackled, as those of us with just one car often find ourselves disadvantaged by those who operate two or more vehicles.
I023	The PCC register of HMOs is out of date. There are far more HMOs than exist on the register.
I026	Please review the HMO databases for Portsmouth - physically get out and review each address and you'll see what's happening to our communities. Focus on families; keep family homes available.

The Portsmouth Society	No thank you
I032	PCC is aware of the extensive problems caused by the overwhelming number of HMO properties used by students in the PO5/PO4 area and the residents feel undervalued as contributors to maintaining, enhancing and creating of communities
I035	I am pleased to see these proposals. I would like to see planning laws changed so that 'unbalanced communities' can move towards being more balanced. Have you considered a need to re-apply for planning permission when an HMO comes up for sale in areas over 10%? I would also like to see consultation of more residents regarding HMO's. One near me only asked 7 local residents - this does not even cover the 50 metres around the property. I would also like to see more 'joined up' thinking around parking and HMO's. An HMO planning application must meet parking standards, but these do not seem very stringent in areas with huge parking problems already.
I038	I think the university needs to take more responsibility for their students.
I041	PCC. Please stop the development of HMOs in areas which are currently high in HMO property. I've owned my property in Manners road for some thirty three years, and have watched this area go down hill very fast. People in this area have been complaining to PCC for years, hoping that PCC would take this particular bull by the horns (HMOs) and put it back in its pen. We Don't Need anymore HMOs in this area. What we need from PCC, is policies that reduce HMOs, with the added knock-on effect of reducing the amount of people in this area. This would mean less, vehicles that need parking spaces, less rubbish that would litter our streets, less strain on local services, and less complains from those who truly care about this area, too PCC. Helps us please.
I043	Paragraph 1.22b appears to go against the principle in paragraph 1.22a. There should be no caveats to the principle in paragraph 1.22a.
I044	There is likely to be excess capacity of rooms in all the new blocks being converted/ erected, PCC should be taking every possible measure to free up much needed property for private use.