

Report of Representations

Representation Summary

164 responses were received in response to the consultation. Out of the responses received, 151 of these were from individuals (mostly local residents) and 13 were from organisations or bodies. Out of the responses received from organisations/bodies, 4 did not wish to make any specific comments.

Some representations were unequivocally in support of, or opposed to, the direction. Several other representations were less clear-cut and expressed views subject to reservations or qualifications.

The vast majority of the comments received from individuals fully supported the SPD, with some respondents wanting the SPD to go further. As expected, significant support from individuals was given to the 10% radius approach (i.e. not more than 10% of dwellings within the specified radius should be HMOs), with approximately 75% of comments explicitly referencing their support for this. However, 33 comments from individuals included replicated text (“no more than 10% to protect our area”) suggesting that this had possibly been circulated and copied and pasted from a template.

Although most of the responses to the consultation were in support of the 10% radius figure, some comments were strongly against this, with one comment stating that this figure ‘could result in the SPD being challenged at appeal’ and another stating ‘that setting the figure at this level is designed to prevent any future HMO applications from being approved.’

As well as responses being received in relation to the guidance restricting the number of HMOs in the area (Preventing Clustering, Preventing Sandwiching, and the Radius Approach), representations were also made regarding other issues such as ‘waste’; ‘parking provision’; ‘cycle storage’; and ‘living space’ with a couple of comments suggesting slight amendments to these. Minor changes to some of the illustrative figures have also been put forward.

A summary of all of the responses received is given in the table on the next page.

**Note that a number of comments are duplicated within the Table as they were signed by more than one respondent.*

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Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Residents / Individuals			
Individual 1	<ul style="list-style-type: none"> • Feels that the SPD should include some form of further control over parking provision and living space in relation to the properties being converted to HMOs. • Regards that thought should also be given to 'the high number of rented properties in the area, which is making it difficult for local people to buy within the areas they live in'. 	<ul style="list-style-type: none"> • Noted. • Noted. However, this is not within the scope of the SPD. 	<ul style="list-style-type: none"> • None. • None.
Individual 2	<ul style="list-style-type: none"> • 'Support the HMO SPD Proposals, especially the 10% radius figure.' 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 4	<ul style="list-style-type: none"> • 'Support the HMO SPD Proposals, especially the 10% radius figure.' 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 5	<ul style="list-style-type: none"> • 'Support for the HMO SPD proposals, in particular the 10% radius limit.' 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.

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Individual 6	<ul style="list-style-type: none"> • 'Support for the HMO SPD proposals, in particular the 10% radius limit.' 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 7	<ul style="list-style-type: none"> • Supports the HMO SPD proposals, especially the criteria that in the radius of 100m of the property'. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 8	<ul style="list-style-type: none"> • Supports the SPD proposals. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 9	<ul style="list-style-type: none"> • States that 'All the houses that are being allowed to be built are far too small'. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 10	<ul style="list-style-type: none"> • Is 'in favour of the full HMO SPD proposal especially the 10% radius figure'. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 11	<ul style="list-style-type: none"> • Feels that the draft 'properly reflects the needs of the area'. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.

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Individual 12	<ul style="list-style-type: none"> Supports the HMO proposals 'specifically the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 13	<ul style="list-style-type: none"> Supports the HMO proposals 'specifically the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 14	<ul style="list-style-type: none"> Supports the HMO SPD proposals 'especially the 10% radius figure'. Further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 15	<ul style="list-style-type: none"> Supports the HMO SPD proposals and would like the 10% radius figure to be enforced along with all the other proposals.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 16	<ul style="list-style-type: none"> Supports the HMO SPD proposals and would like the 10% radius figure to be enforced along with all the other proposals.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

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Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 17	<ul style="list-style-type: none"> Supports the proposals 'particularly the 10% radius figure'. Is also 'very much in favour of the proposals for parking provision'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 18	<ul style="list-style-type: none"> Supports the proposals 'particularly the 10% radius figure'. Is also 'very much in favour of the proposals for parking provision'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 19	<ul style="list-style-type: none"> Gives 'full support for the HMO SPD Proposals, especially the 10% radius figure.' Also feels 'that there should not be three HMOs in a row, or two HMOs opposite two HMOs, and, certainly, not a residential house sandwiched by an HMO on each side.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 20	<ul style="list-style-type: none"> Gives 'full support for the HMO SPD Proposals, especially the 10% radius figure.' Also feels 'that there should not be three HMOs in a row, or two HMOs opposite two HMOs, and, certainly, not a residential house sandwiched by an HMO on each side.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> Noted.
Individual 21	<ul style="list-style-type: none"> Supports the proposed SPD. Also feels that the Council could support the area's 'untidiness by providing more bins for these households' as well as by 'enforcing landlords to keep the outside of the houses and gardens in good condition'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

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Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 22	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 23	<ul style="list-style-type: none"> Supports the HMO SPD 'as per Pat and Lynda Lally's flyer'. 	<ul style="list-style-type: none"> The Council has not had sight of this flyer. 	<ul style="list-style-type: none"> None.
Individual 24	<ul style="list-style-type: none"> Fully supports the HMO SPD proposals 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 25	<ul style="list-style-type: none"> Supports the SPD specifically the proposed guidance for the radius approach; clustering; and sandwiching. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 26	<ul style="list-style-type: none"> Supports the proposed HMO SPD 'especially the 10% radius proposal'. Feels that 'we should build more purpose built student accommodation and that 'we need to preserve...good quality family housing'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

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Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 27	<ul style="list-style-type: none"> Supports the proposals within the HMO SPD. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 28	<ul style="list-style-type: none"> Supports the HMO SPD proposals 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 29	<ul style="list-style-type: none"> Supports the HMO SPD proposals 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 30	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 31	<ul style="list-style-type: none"> Expresses concern regarding the changes to the residential nature of the area. Proposes a guideline to state as below: 'In a radius of 100 metres of the property there should be no more than 10% HMOs already. It's clear there are already lots of HMO's in some streets, plus the other proposals about 2 HMO's opposite each other and 3 consecutive HMO's in a street.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

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	<ul style="list-style-type: none"> Is also concerned about the Broadgate House development. 	<ul style="list-style-type: none"> Any representations to the planning application will be considered as part of this process. It is not within the scope of the SPD to address these. 	<ul style="list-style-type: none"> None.
Individual 32	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 33	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. States that in cases the 10% limit has already been surpassed. 	<ul style="list-style-type: none"> Noted. Noted. 	<ul style="list-style-type: none"> None. None.
Individual 34	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

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	<ul style="list-style-type: none"> States that in cases the 10% limit has already been surpassed. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 35	<ul style="list-style-type: none"> Fully supports the SPD proposals. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 36	<ul style="list-style-type: none"> Supports the HMO SPD proposals 'especially the 10% radius figure' and gives further support to the proposed guidance on clustering and sandwiching. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 37	<ul style="list-style-type: none"> Supports the HMO SPD proposals 'especially the 10% radius figure' and gives further support to the proposed guidance on clustering and sandwiching. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 38	<ul style="list-style-type: none"> References the negative impacts of HMOs. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 39	<ul style="list-style-type: none"> Supports the HMO SPD proposals 'especially the 10% radius figure' and states that the proposals are 'the minimum action needed'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 40	<ul style="list-style-type: none"> Supports the HMO SPD proposals 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

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	<ul style="list-style-type: none"> States that there are 'far too many houses of multiple occupancy in Beeston.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 41	<ul style="list-style-type: none"> Notes impact of HMOs and notes that 'a good mix of accommodation leads to a better and more varied community'. 	<ul style="list-style-type: none"> Noted and agree. 	<ul style="list-style-type: none"> None.
Individual 42	<ul style="list-style-type: none"> Supports the HMO SPD proposals. Holds that 'all the suggested guidelines are necessary to retain the residential community feel of the area.' 	<ul style="list-style-type: none"> Noted. Noted. 	<ul style="list-style-type: none"> None. None.
Individual 43	<ul style="list-style-type: none"> 'Generally supports SPD which will help create more cohesive communities'. Suggests that 'change of use from Residential to HMO to require planning permission and for the proposed rules on HMO proliferation to be implemented across the whole area.' 	<ul style="list-style-type: none"> Largely agree. This is outside of the scope of this SPD. The Article 4 area has already been decided and the Article 4 Direction has already been adopted. 	<ul style="list-style-type: none"> None. None.

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Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 44	<ul style="list-style-type: none"> Supports the HMO SPD proposals specifically the suggested guidance on clustering and sandwiching and the radius approach. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 45	<ul style="list-style-type: none"> Supports the HMO SPD proposals specifically the suggested guidance on clustering and sandwiching and the radius approach. Is worried that 'there are many HMOs which will never be included in the 10% as they were in use before the Article 4,' References current car-parking issues. 	<ul style="list-style-type: none"> Noted. Noted. Noted. 	<ul style="list-style-type: none"> None. None. None.
Individual 46	<ul style="list-style-type: none"> Supports the HMO SPD proposals specifically the suggested guidance on clustering and sandwiching and the radius approach. Is worried that 'there are many HMOs which will never be included in the 10% as they were in use before the Article 4,' References current car-parking issues. 	<ul style="list-style-type: none"> Noted. Noted. Noted. 	<ul style="list-style-type: none"> None. None. None.

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Individual 47	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 48	<ul style="list-style-type: none"> Supports the HMO SPD proposal with specific reference to the 10% radius figure. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 49	<ul style="list-style-type: none"> Supports the HMO SPD proposal with specific reference to the 10% radius, however states that this 'must take into account existing HMOs'. Requests that 'before any HMO permission is granted we would ask the Council to carry out a survey of HMOs in that area.' 	<ul style="list-style-type: none"> Noted. Noted. 	<ul style="list-style-type: none"> None. None.
Individual 50	<ul style="list-style-type: none"> Supports the HMO SPD proposal with specific reference to the 10% radius, however states that this 'must take into account existing HMOs'. Requests that 'before any HMO permission is granted we would ask the Council to carry out a survey of HMOs in that area.' 	<ul style="list-style-type: none"> Noted. Noted. 	<ul style="list-style-type: none"> None. None.

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Individual 51	<ul style="list-style-type: none"> • Would like this to be monitored in a way that ‘does not allow loopholes’. • Regards that the 10% radius figure should include existing HMOs. 	<ul style="list-style-type: none"> • The implementation of this document and the Article 4 direction relating to HMOs will be monitored and reported on an annual basis as part of the Authority’s Monitoring Report (AMR). The Council’s planning enforcement process will also be implemented if concerns are reported. • Noted. 	<ul style="list-style-type: none"> • None. • None.
Individual 52	<ul style="list-style-type: none"> • Gives thanks to a letter received from Cllrs Lynda and Pat Lally. 	<ul style="list-style-type: none"> • The Council has not had sight of this letter. 	<ul style="list-style-type: none"> • None.

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	<ul style="list-style-type: none"> States that affordable homes and accommodation for 'our children' are needed and notes that 'every street in Beeston is being taken up with HMOs'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 53	<ul style="list-style-type: none"> Supports the HMO SPD proposals and states that 'there are already too many HMOs in Beeston.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 54	<ul style="list-style-type: none"> References the negative impacts of HMOs and states that if the SPD had been adopted sooner the number of HMOs would have been considerably fewer'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 55	<ul style="list-style-type: none"> Supports the HMO SPD proposals with particular reference to the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 56	<ul style="list-style-type: none"> Approves of the Article 4 Direction and supports the 10% radius figure. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 57	<ul style="list-style-type: none"> Supports the proposed HMO SPD 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 58	<ul style="list-style-type: none"> Agrees with the 10% radius figure and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

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Individual 59	<ul style="list-style-type: none"> Supports 'the HMO SPD proposals for the Broxtowe area.' 	<ul style="list-style-type: none"> Noted, although the SPD does not cover the whole Borough. 	<ul style="list-style-type: none"> None.
Individual 60	<ul style="list-style-type: none"> Supports the HMO SPD specifically in relation to the below: '10% radius figure Approach Preventing sandwiching Preventing Clustering Bin Storage and Waste Monitoring and Review' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 61	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 62	<ul style="list-style-type: none"> Supports the HMO SPD specifically the 10% radius figure. Goes into detail regarding the negative impact of there being an over-concentration of HMOs. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

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Individual 63	<ul style="list-style-type: none"> • Supports the HMO SPD proposals. • Suggests that ‘the planning dept. should have a walk around the back streets of Beeston to see how run down the area is becoming’. 	<ul style="list-style-type: none"> • Noted. • Noted. 	<ul style="list-style-type: none"> • None. • None.
Individual 64	<ul style="list-style-type: none"> • Supports the HMO SPD proposals ‘and in particular the 10% radius figure’. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 65	<ul style="list-style-type: none"> • Supports the HMO SPD proposals ‘especially the 10% radius figure.’ 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 66	<ul style="list-style-type: none"> • ‘Strongly’ supports the HMO SPD proposals. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 67	<ul style="list-style-type: none"> • Supports the HMO SPD with specific reference to the 10% radius figures. • Feels that the area covered by the SPD should be extended to include the west of Beeston and the east of Chilwell. 	<ul style="list-style-type: none"> • Noted. • Noted. However, the Article 4 area has already been approved and so this is outside of the remit of the SPD. 	<ul style="list-style-type: none"> • None. • None.

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	<ul style="list-style-type: none"> Suggests that it would be useful for the Planning Department to have an 'informal register' detailing how many HMOs there are in Beeston and Chilwell. 	<ul style="list-style-type: none"> Noted. The Planning department are trying to collate this information as far as possible within the remit of GDPR. 	<ul style="list-style-type: none"> None.
Individual 68	<ul style="list-style-type: none"> Supports the HMO SPD proposals. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 69	<ul style="list-style-type: none"> Supports 'all of the proposals by Cllr Lally'. 	<ul style="list-style-type: none"> The planning team has not had sight of any proposals put forward by Cllr Lally. 	<ul style="list-style-type: none"> None.
Individual 70	<ul style="list-style-type: none"> States that it is important for the document to be adopted as soon as possible. States that the suggested boundary 'has been greatly exceeded already' and that children of residents are not able to buy within Beeston due to high prices as 'developers have been allowed to take hold without restraint'. 	<ul style="list-style-type: none"> Noted and agree. Noted. 	<ul style="list-style-type: none"> None. None.

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Individual 71	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 72	<ul style="list-style-type: none"> Supports the HMO SPD, particularly the '10% radius figure and the provision for 0.5 parking spaces per bedroom. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 73	<ul style="list-style-type: none"> Notes that many of the proposals within the draft SPD are welcome but 'overdue' and states that the Article 4 Direction 'should cover the whole of Beeston'. Is concerned that 'developers will try to get around the current definition of an HMO which involves sharing a bathroom by putting in tiny ensuite facilities', and queries whether something can be added with the SPD to avoid this. Feels that further clarification is needed within the document regarding parking issues. 	<ul style="list-style-type: none"> Noted. The Article 4 area has already been approved and so this is outside of the remit of the SPD. Noted. However, the SPD cannot change the legal definition of an HMO. Noted. 	<ul style="list-style-type: none"> None. None. None.

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Individual 74	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 75	<ul style="list-style-type: none"> Agrees with the proposals of the SPD. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 76	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 77	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 78	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. Lists negative impacts of there being too HMOs. 	<ul style="list-style-type: none"> Noted. Noted. 	<ul style="list-style-type: none"> None. None.
Individual 79	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

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	<ul style="list-style-type: none"> Lists negative impacts of there being too HMOs. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 80	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. Lists negative impacts of there being too HMOs. 	<ul style="list-style-type: none"> Noted. Noted. 	<ul style="list-style-type: none"> None. None.
Individual 81	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 82	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure'. Regards that more housing is needed for families. 	<ul style="list-style-type: none"> Noted. Noted. 	<ul style="list-style-type: none"> None. None.
Individual 83	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 84	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 85	<ul style="list-style-type: none"> Pleased that the Article 4 Direction has been implemented and regards that 10% is a reasonable threshold. Believe that 'community interests would now be much better served by increasing the amount of social housing available, and in taking care in how future student accommodation is located'. 	<ul style="list-style-type: none"> Noted. Noted. This is not within the scope of the SPD. 	<ul style="list-style-type: none"> None. None.
Individual 86	<ul style="list-style-type: none"> Pleased that the Article 4 Direction has been implemented and regards that 10% is a reasonable threshold. Believe that 'community interests would now be much better served by increasing the amount of social housing available, and in taking care in how future student accommodation is located'. 	<ul style="list-style-type: none"> Noted. This is not within the scope of the SPD. 	<ul style="list-style-type: none"> None. None.
Individual 87	<ul style="list-style-type: none"> Notes that many of the existing HMOs are unknown to the Council. Supports the 10% threshold. 	<ul style="list-style-type: none"> Noted. Noted. 	<ul style="list-style-type: none"> None. None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 88	<ul style="list-style-type: none"> • Discusses negative impacts of having students as neighbours, and the regular change of such neighbours. • Welcomes the 10% threshold but holds that it would be good for the Council to identify the number of existing HMOs (which the respondent states in some cases exceeds 50% on certain streets). • Notes that some of the guidance (sandwiching) will make no difference to homes which already have unregistered HMOs either side. 	<ul style="list-style-type: none"> • Noted. • Noted. The planning department are trying to collate this information as far as possible within the remit of GDPR. • Noted. 	<ul style="list-style-type: none"> • None. • None. • None.
Individual 89	<ul style="list-style-type: none"> • Discusses negative impacts of having students as neighbours, and the regular change of such neighbours. • Welcomes the 10% threshold but holds that it would be good for the Council to identify the number of existing HMOs (which the respondent states in some cases exceeds 50% on certain streets). 	<ul style="list-style-type: none"> • Noted. • Noted. The planning department are trying to collate this 	<ul style="list-style-type: none"> • None. • None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<ul style="list-style-type: none"> Notes that some of the guidance (sandwiching) will make no difference to homes which already have unregistered HMOs either side. 	<p>information as far as possible within the remit of GDPR.</p> <ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 90	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 91	<ul style="list-style-type: none"> Comment states 'who cares. I don't.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 92	<ul style="list-style-type: none"> 'Support the HMO SPD proposals.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 93	<ul style="list-style-type: none"> 'Support the HMO SPD proposals.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 94	<ul style="list-style-type: none"> 'wholeheartedly' supports the HMO SPD proposals. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 95	<ul style="list-style-type: none"> Support the HMO SPD proposals particularly the 10% relative to the total number of properties in the given 100m radius'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 96	<ul style="list-style-type: none"> Support the HMO SPD proposals particularly the 10% relative to the total number of properties in the given 100m radius'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 97	<ul style="list-style-type: none"> 'Strongly' support all of the proposals within the HMO SPD. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 98	<ul style="list-style-type: none"> 'Strongly' support all of the proposals within the HMO SPD. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 99	<ul style="list-style-type: none"> Feels that student HMOs should be a separate Use Class. Regards that retrospective planning applications should be required if: '(an) address(es) were either to: flit from HMO into student-HMO 	<ul style="list-style-type: none"> This is outside of the scope of both the SPD and Council. Noted. 	<ul style="list-style-type: none"> None. Noted.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<p>- or vice versa - or, change the actual person(s) who is and/or are there's owner(s)</p>		
Individual 100	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 101	<ul style="list-style-type: none"> Is 'against the proposal to limit the number of Houses in Multiple Occupation. The respondent states that doing this 'is a blow to our freedoms' and 'harms the property market. States that the proposals are 'agesit' and 'classist'. 	<ul style="list-style-type: none"> Noted. Disagree that the document is 'ageist' and 'classist'. An Equality Impact Assessment (EIA) has been completed as part of the process. 	<ul style="list-style-type: none"> None.
Individual 102	<ul style="list-style-type: none"> Is 'in favour of the proposed SPD' and feels that 'it will be beneficial for residents of the areas.' 	<ul style="list-style-type: none"> Noted and largely agree. 	<ul style="list-style-type: none"> None.
Individual 103	<ul style="list-style-type: none"> Supports the proposals, specifically the 10% radius figure. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 104	<ul style="list-style-type: none"> Supports the SPD proposals 'particularly the 10% radius limit'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 105	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 106	<ul style="list-style-type: none"> Is pleased that the Article 4 has been adopted. It disappointed as initially thought that the Article 4 would mean that there would be 'no further HMOs within this area'. Has some reservations on how the proposals within the SPD will work. Notes that the suggestions for managing applications 'seem acceptable' and supports the proposed 10% radius approach. Regards that 'the starting point for understanding the current volumes of HMOs is...not yet in place' and queries whether there are 'plans to allocate resources to this particular initiative to insure that the information held by BBC is a true reflection of the current status.' 	<ul style="list-style-type: none"> Noted. Noted. Noted. Noted. The Planning department are trying to collate this information as far as possible within the remit of GDPR. 	<ul style="list-style-type: none"> None. None. None. None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<ul style="list-style-type: none"> Feels that the information currently held by the Council around registered HMOs (both small and large) should be publically available and that members of the public should have the ability to alert the Council of any premises that would appear to be operating as a HMO without the relevant permissions and are not on the Council's list. 	<p>Members of the public can report any concerns regarding houses operating as HMOs and the enforcement team would investigate these.</p> <ul style="list-style-type: none"> Noted. The Planning department are trying to collate this information as far as possible within the remit of GDPR. Members of the public can report any concerns regarding houses operating as HMOs and the enforcement team would investigate these. 	<ul style="list-style-type: none"> None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<ul style="list-style-type: none"> • Queries whether there is an opportunity to link information with the Council's Council Tax department. • Queries how the Council will manage houses that are identified as operating as a HMO after the Article 4 adoption date but where the landlord indicates that they were operating as a HMO prior to the Article 4 Direction's implementation. Holds that in such instances, if the landlord did not inform the Council before the Article 4 adoption date, that the property should be subject to the measures within the SPD. 	<ul style="list-style-type: none"> • This has already been explored and is unfortunately not possible due to data protection reasons. • If a property is subject to planning enforcement, then evidence will be sought. However, the SPD cannot change the law as regards whether planning permission is needed. 	<ul style="list-style-type: none"> • None. • None.
Individual 107	<ul style="list-style-type: none"> • Support the HMO SPD Proposals, 'especially the 10% radius figure' as 'there are already a considerable number of HMOs' in operation before the Article 4 came into effect. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 108	<ul style="list-style-type: none"> • Supports the HMO SPD proposals 'especially the 10% radius figure'. Further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 109	<ul style="list-style-type: none"> Supports the HMO SPD proposals 'especially the 10% radius figure'. Further states that 'it is important that there are homes for residents to live in and that no more residential properties are converted into student properties.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 110	<ul style="list-style-type: none"> Writes: 'Fully support proposals as detailed in pat lally flyer.' 	<ul style="list-style-type: none"> The Council has not had sight of this flyer. 	<ul style="list-style-type: none"> None.
Individual 111	<ul style="list-style-type: none"> Fully supports the proposals and 'any other policies...to reduce the amount of HMO buildings in Beeston'. Also requests that the Council 'cancel the planning permission given to Broadgate House and whatever is happening to the old Kings Carpets building' and for affordable housing to be built here instead. 	<ul style="list-style-type: none"> Noted. Noted. This is beyond the scope of the SPD. 	<ul style="list-style-type: none"> None. None.
Individual 112	<ul style="list-style-type: none"> Supports the proposed radius approach. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 113	<ul style="list-style-type: none"> Writes that 'Permitted development rights only apply to those properties that can demonstrate they were occupied 	<ul style="list-style-type: none"> Noted. Believe that the Article 4 	<ul style="list-style-type: none"> None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<p>as a HMO prior to 26th March 2022' and suggests that this is clarified in the text of the document.</p> <ul style="list-style-type: none"> • States that there 'are significant concerns about the Councils register of HMO properties, with seemingly many properties not registered'. • Regards that the 'Making a Planning Application' section should 'state that the onus will be placed on the applicant to explain as part of application correspondence how they have considered the proximity of "known HMOs" and explained how the adverse effects are addressed.' • Regards that HMOs are often not an affordable renting option and so the reference (on page 7) of 'affordable rental accommodation' should be removed. 	<p>Direction and Permitted Development have already been sufficiently explained within the document.</p> <ul style="list-style-type: none"> • Noted. The Planning department are trying to collate this information as far as possible within the remit of GDPR. • Noted. • Noted. 	<ul style="list-style-type: none"> • None. • Text will be added to 'encourage' applicants to do this. • Will remove 'affordable'.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<ul style="list-style-type: none"> • The following text (on page 7) – “...increases in waste associated problems due to inadequate or inappropriate waste storage;...” should be replaced with “...increases in waste associated problems due to inadequate or inappropriate waste storage and issues with management of waste by tenants;...” • Supports the Clustering and; the Managing the Concentration of HMOs proposals (including Sandwiching); and the 10% Radius approach but has ‘a significant concern...that the application of criteria will be compromised because the council register of licensed HMOs is incomplete.’ • States that ‘it is essential that a Planning Condition of any planning approval for all properties is that sound insulation in partitions, floors and party walls is required, and that it should meet or exceed specified industry best practice standards.’ • Regarding Safe Access and Adequate Parking, respondent notes that ‘All vehicles must be parked off-street wherever possible where off street parking facilities exist. Any HMO property without off-street parking should be refused. A requirement for HMO properties is that the number of cars at the property must not at any time exceed 	<ul style="list-style-type: none"> • Noted. • Noted. The Planning department are trying to collate this information as far as possible within the remit of GDPR. • Noted. Believe that this is covered in the section on Sound Reduction Measures. • Noted. 	<ul style="list-style-type: none"> • Will incorporate suggested wording. • None. • None. • None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<p>the proposed threshold of 0.5 car-parking spaces per bedroom. This should be applied as a Condition of any planning approval, and subject to monitoring, and enforcement in response to reported non-compliance'</p> <ul style="list-style-type: none"> • States that 'no more than 50% of the frontage of a property should be permitted to be concreted over or used for parking and this should be applied as a Condition of any planning approval, and the assessment of compliance with the parking criteria for new applications should take account of this restriction.' • States that the Bin Storage and Waste section makes 'makes no reference to the responsibilities for tenants to manage waste.' 	<ul style="list-style-type: none"> • Noted. Believe that this is adequately covered. • Noted. 	<ul style="list-style-type: none"> • None. • Text will be included to reflect comment.
Individual 114	<ul style="list-style-type: none"> • Supports the HMO SPD proposals 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 115	<ul style="list-style-type: none"> • Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 116	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 117	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 118	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 119	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 120	<ul style="list-style-type: none"> Supports the proposals and notes the impacts of increasing numbers of HMOs on the area. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 121	<ul style="list-style-type: none"> Supports the proposals within the SPD particularly, the 10% radius approach. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 122	<ul style="list-style-type: none"> Notes the impacts of too many HMOs. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<ul style="list-style-type: none"> • ‘Fully supports’ the HMO proposals, ‘in particular the 10%’ radius approach’. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 123	<ul style="list-style-type: none"> • Notes the impacts of too many HMOs. • Fully supports the HMO proposals, ‘in particular the 10%’ radius approach’. 	<ul style="list-style-type: none"> • Noted. • Noted. 	<ul style="list-style-type: none"> • None. • None.
Individual 124	<ul style="list-style-type: none"> • ‘Strongly support’ the HMO proposals, especially the 10% radius figure. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 125	<ul style="list-style-type: none"> • Supports the HMO SPD proposal ‘especially the 10% radius figure’ and further states ‘no more than 10% to protect our area’. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 126	<ul style="list-style-type: none"> • Fully supports the SPD proposals, particularly the 10% radius approach. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 127	<ul style="list-style-type: none"> • Discusses impacts of too many HMOs. • Supports the HMO SPD proposals but ‘would like it to go further and prevent further HMO conversions’ and ‘preferably prevented completely’. 	<ul style="list-style-type: none"> • Noted. • Noted. It is not the purpose or role of the SPD to 	<ul style="list-style-type: none"> • None. • None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
		completely prevent development.	
Individual 128	<ul style="list-style-type: none"> Supports the HMO proposals 'including the 10% threshold, not allowing residential properties to be sandwiched between two HMOs and preventing three or more consecutive HMOs on a street.' 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> Noted.
Individual 129	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 130	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 131	<ul style="list-style-type: none"> Fully supports the proposals, 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 132	<ul style="list-style-type: none"> Supports the HMO SPD proposals 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 133	<ul style="list-style-type: none"> Supports the HMO SPD proposals, especially the 10% radius approach figure. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 134	<ul style="list-style-type: none"> Supports the HMO SPD proposals 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 135	<ul style="list-style-type: none"> Fully supports the SPD proposals, particularly the 10% radius approach figure. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 136	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 137	<ul style="list-style-type: none"> Has become increasingly concerned about the numbers of properties being converted to Houses in Multiple Occupation. Strongly supports the HMO SPD proposals 'in particular the 10% radius figure'. Hopes that the proposals will be accepted and utilised. 	<ul style="list-style-type: none"> Noted. Noted. 	<ul style="list-style-type: none"> None. None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<ul style="list-style-type: none"> References the importance 'that a balanced mix of residents is preserved as far as possible'. 	<ul style="list-style-type: none"> Agree. 	<ul style="list-style-type: none"> None.
Individual 138	<ul style="list-style-type: none"> Feels that the proposals 'will help to prevent the over concentration of HiMOs in the area before the situation is beyond repair' and particularly approves of the radius approach as well as the text which addresses parking problems. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 139	<ul style="list-style-type: none"> Supports the HMO SPD proposal 'especially the 10% radius figure'. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
Individual 140	<ul style="list-style-type: none"> Supports the HMO SPD. States that over time 'the whole character of the area has changed with many houses turning into HMOs' and estimates that on certain streets 'at least 60% of the homes are HMOs'. States that 'given that there are no official numbers' regarding existing HMOs, the 10% radius figure 'is reasonable'. 	<ul style="list-style-type: none"> Noted. Noted. Noted. 	<ul style="list-style-type: none"> None. None. None.
Individual 141	<ul style="list-style-type: none"> Supports the HMO SPD. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<ul style="list-style-type: none"> • States that there are ‘too many students’ and ‘not enough houses for families’. • References the negative impacts of too many HMOs. 	<ul style="list-style-type: none"> • Noted. • Noted. 	<ul style="list-style-type: none"> • None. • None.
Individual 142	<ul style="list-style-type: none"> • Supports the proposals, especially the 10% radius figure to ‘protect’ the area. • States that too many HMOs impacts upon the ‘feel’ of the local community. 	<ul style="list-style-type: none"> • Noted. • Noted. 	<ul style="list-style-type: none"> • None. • None.
Individual 143	<ul style="list-style-type: none"> • Supports the HMO SPD proposal ‘especially the 10% radius figure’ and further states ‘no more than 10% to protect the area’. • Would like to understand how the planning team are going to identify and register the current existing unknown HMO's against those that are registered and permitted to allow for a fair planning process for future applications. • Does not feel that there are ‘processes in place to pick up on HMO planning infringements.’ 	<ul style="list-style-type: none"> • Noted. • Noted. The Planning department are trying to collate this information as far as possible within the remit of GDPR. • Any infringements would be subject to the standard 	<ul style="list-style-type: none"> • None. • None. • None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
		<p>planning enforcement process.</p>	
<p>Individual 144</p>	<ul style="list-style-type: none"> • Supports the HMO SPD proposal ‘especially the 10% radius figure’ and further states ‘no more than 10% to protect the area’. • Would like to understand how the planning team are going to identify and register the current existing unknown HMO's against those that are registered and permitted to allow for a fair planning process for future applications. • Does not feel that there are ‘processes in place to pick up on HMO planning infringements.’ 	<ul style="list-style-type: none"> • Noted. • Noted. The Planning department are trying to collate this information as far as possible within the remit of GDPR. • Any infringements would be subject to the standard planning enforcement process. 	<ul style="list-style-type: none"> • None. • None. • None.
<p>Individual 145</p>	<ul style="list-style-type: none"> • Supports the proposals 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
Individual 146	<ul style="list-style-type: none"> • Is 'concerned about the number of properties being converted to Houses in Multiple Occupation'. • Supports the HMO SPD proposal 'especially the 10% radius figure' and states that 'there should be no more than 10% HMOs already.' 	<ul style="list-style-type: none"> • Noted. It is hoped that the SPD will help to resolve this. • Noted. 	<ul style="list-style-type: none"> • None. • None.
Individual 147	<ul style="list-style-type: none"> • 'Fully support all proposals... especially the limit of 10% HMO in 100 m radius'. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 148	<ul style="list-style-type: none"> • 'Fully support all proposals... especially the limit of 10% HMO in 100 m radius'. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Individual 149	<ul style="list-style-type: none"> • Supports the HMO SPD proposal 'especially the 10% radius figure' and further states 'no more than 10% to protect our area'. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Cllr Steve Carr			

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<ul style="list-style-type: none"> Feels that 'the 10% figure is too small' and results that this could result in an SPD 'that could be successfully challenged if appealed to the Inspector on the grounds the figure is unreasonable'. Therefore, would 'support a 20% figure'. 	<ul style="list-style-type: none"> Agree. Planning Officers at the Council would also encourage a radius figure of 20%. 	<ul style="list-style-type: none"> Propose amending the radius figure to 20%.
Cllr Barbara Carr	<ul style="list-style-type: none"> Agrees in general with the draft document but specifically notes that '10% relative to a radius of 100m is too low and may result in appeals to the Planning Inspector with a likely overturn of our policy'. 	<ul style="list-style-type: none"> Agree. Planning Officers at the Council would also encourage a radius figure of 20%. 	<ul style="list-style-type: none"> Propose amending the radius figure to 20%.
Organisations / Other Bodies			
Nottingham County Council -	<ul style="list-style-type: none"> Has no comments to make. 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A
Nottinghamshire County Council – Highways Department	<ul style="list-style-type: none"> Nottinghamshire County Council's Design Guide recommends 1 space per bedroom and the response suggests that this should be reflected in the SPD as opposed to 0.5 spaces per bedroom. 	<ul style="list-style-type: none"> Noted and agree. 	<ul style="list-style-type: none"> Will change 0.5 per bedroom to 1 space per bedroom.

Report of Representations

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	<ul style="list-style-type: none"> • States that ‘access to waste storage areas from the public highway should be available whilst all parking spaces are occupied.’ • States that the County Council Highways Department are ‘unlikely to respond favourably to proposals that displace vehicles on-street, in/around a junction’. Further notes that ‘off-street parking areas accessed directly from the public highway must be served from a dropped kerb vehicular crossing. • Would like the document to quantify the level of cycle provision and request that this mirrors the County Council’s standard of 1 space per bedroom.’ 	<ul style="list-style-type: none"> • Noted and agree. • Noted. This is sufficiently covered within the SPD. • Noted and agree. 	<ul style="list-style-type: none"> • Will incorporate suggested wording. • None. • The SPD will clarify cycle provision and will correspond with the County Council’s standard of 1 space per bedroom.

Report of Representations

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Nottingham City Council	<ul style="list-style-type: none"> • Suggests including paragraph numbers in the document. • Regarding the Table on Page 5, the response suggests that the heading 'Change' is replaced with 'Type of Development'. The response also suggests expanding the 'Do I need permission?' column to include sub-categories of 'Within Article 4 Area only' and 'Within Administration Area' and then a tick symbol (or "yes") used for each that applies. • States 'under the heading "HMO Licensing" it may be worth noting that gaining Planning Permission for the change of use (or extension to existing HMO) does not necessarily mean that an HMO license will be granted either.' • An explanation could be given to what the Icen report is. 	<ul style="list-style-type: none"> • Agree. • Agree. • Agree. • Noted. 	<ul style="list-style-type: none"> • Paragraph numbers will be included within the final version of the document. • Will make changes in line with the response. • Will alter text of the SPD in line with comment for clarity. • None.

Report of Representations

Respondent type and Date received	Representation/Consultation Response	Council Comment	Action Recommended
	<ul style="list-style-type: none"> • ‘Preventing Clustering’; ‘Radius Approach’; and ‘Preventing Sandwiching’ it could be made clear what will happen if a development doesn’t meet one approach, but does another. Will the application be allowed or does the development have to meet all three? • Suggests changing “... proposals for the development of houses in multiple occupation will not be granted planning permission where the development would result in ...” to “... proposals for the development of houses in multiple occupation are unlikely to be granted planning permission where the development would result in ...” • States that ‘Figure 6 appears somewhat confusing as it suggests that any adjoining residential property would not be allowed to be converted to an HMO if it adjoins any Class C3 Dwelling. It may make sense to shade the house to the north east green as “existing HMO” as this then works to explain the guidance better.’ • States that with the boundary of Broxtowe and City overlapping it is not stated how the radius approach will be assessed where data may not be known outside of Broxtowe. 	<ul style="list-style-type: none"> • Noted. This is sufficiently covered within the SPD. • Largely agree. • Disagree. We hold that the diagram is sufficiently clear. • Noted. 	<ul style="list-style-type: none"> • None. • Will alter text of the SPD to add flexibility. • None. • Text will be added to further suggest that assessments are guides

Report of Representations

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	<ul style="list-style-type: none"> • Notes that the approach taken is different to that of the City Council in respect to that within Nottingham City, the Article 4 area is across the whole of the administrative area. • States that 'Nottingham city assess the number of HMO and known Student Council Tax Exemptions in the immediate and adjoining Output Areas.' Advocates collating and using Council Tax data. • States that under the section "Living Space and Layout" the document notes that room sizes are a matter for the "Private Sector Housing team". Response suggests that it may be worth clarifying that this relates to HMO licensing compliance in this context. 	<ul style="list-style-type: none"> • Noted. • This was looked into but was not considered to be an option due to data protection reasons. • Noted. 	<p>rather than strict policies.</p> <ul style="list-style-type: none"> • None. • None. • Will include text to make clear that the Private Sector Housing team deal with HMO

Report of Representations

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			licensing compliance.
CP Walker & Son (response one)	<ul style="list-style-type: none"> • Regards that the SPD ‘creates a policy of entirely restricting new HMOs in the Article 4 area.’ • States that the SPD also does ‘not inform applicants nor Officers about requirements as the information needed to know whether an application is compliant or not is unknown to neither group’ and does ‘not consider the needs of the occupiers of HMOs nor homeowners of C3 properties who want/need to sell their properties.’ 	<ul style="list-style-type: none"> • Disagree. • It is not the role of the SPD to consider the impacts on selling properties. It is also considered that the SPD strikes an appropriate balance between the needs of individual occupiers, individual homeowners and the wider community. 	<ul style="list-style-type: none"> • None. • None.

Report of Representations

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	<ul style="list-style-type: none"> • States that ‘the inclusion of the word ‘known’ is a key issue’ and queries whether the Council is ‘intending to create, maintain and publish a list of known HMOs that would assist all parties’ • Regarding the Radius Approach, the response states that setting the figure at 10% is ‘designed to prevent any future HMO applications from being approved’ and that this ‘not only sets new policy, rather than clarifying existing but in my view is manifestly unreasonable’ and does not consider a range of interests’. • Response notes that the SPD ‘will have a significant negative impact on the value of properties that will be disbarred from making successful C4 change of use applications.’ • Queries whether the Clustering section would ‘achieve the aim of minimising impact’. • Supports the Sound Reduction section but queries why this does not extend to all application types within the Borough. 	<ul style="list-style-type: none"> • Noted. The planning department are trying to collate this information as far as possible within the remit of GDPR. • Noted • Noted. The changing value of properties is not a planning matter. • Regard that it would achieve this aim. • Noted. 	<ul style="list-style-type: none"> • None. • Propose to change the 10% radius figure to 20%. • None. • None. • None.

Report of Representations

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	<ul style="list-style-type: none"> • Queries evidence base regarding Access & Parking section and asks 'what routes are available via planning conditions to manage car-parking provision?'. Also holds that car ownership within HMOs are quite low and so queries the proposed 0.5 spaces per bedroom wording and further notes that cars parked along streets could belong to commuters as well as occupiers. • Supports the objective of the Cycle Storage section but queries the benefit of providing storage internally. Regards that secure external storage would be a better option. • Is in agreement with the Waste section. 	<ul style="list-style-type: none"> • Noted. All applications are individually assessed on their own merit. • Noted. • Noted. 	<ul style="list-style-type: none"> • None. • None. • None.
CP Walker & Son (response two)	<ul style="list-style-type: none"> • Queries who is intended to benefit from the proposals and how will they benefit? • States that the Article 4 Direction may cause house prices to decrease (as it has within the City). 	<ul style="list-style-type: none"> • It is envisaged that the community will benefit as the document will help to create and maintain a balanced community. • Noted. 	<ul style="list-style-type: none"> • None. • None.

Report of Representations

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	<ul style="list-style-type: none"> • Regarding the radius approach, the respondent states that ‘it looks like you are trying to introduce policy to prevent any new applications from being passed within the Article 4 area, not add clarity to the existing policy. This isn’t what an SPG is supposed to do and there is a risk that the document becomes worthless if this happens.’ • Regards that emphasis should be on whether a proposal negatively impacts upon the character of the area as opposed to a policy based on percentages, which is less flexible. • States that the guidance for the percentage approach cannot be implemented properly without the data for HMOs in the area being available. 	<ul style="list-style-type: none"> • Noted. However, this is not what the SPD is attempting to do. Rather, the SPD seeks to create and maintain a healthy and balanced community. • Applications will also be assessed in line with the Local Development Plan, which includes impacts upon the character of the area. • Noted. The Planning department are trying to collate this information as far 	<ul style="list-style-type: none"> • None. • None. • None.

Report of Representations

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		as possible within the remit of GDPR.	
Sport England	<ul style="list-style-type: none"> • 'Do not wish to comment on the SPD.' 	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A
Beeston Civic Society	<ul style="list-style-type: none"> • 'Supports the general premise of the SPD' • Calls for one of the following suggested wording to be included: 'ANY change of use from Residential to HMO within Beeston to require planning permission.' Or; 'All of Beeston to be included in the A4D area, and the current A4D area to form the 'Cluster Area'.' • Calls for the Council to 'prevent more of our streets not within the A4D becoming HMOs cluster areas in future'. • Stresses that Beeston has a need for affordable houses now. 	<ul style="list-style-type: none"> • Noted. • Noted. However, the Article 4 Direction has already been determined and it is not within the scope of the SPD to change this. Therefore, the SPD cannot include either of the suggested text. • Noted. However, this is not within the scope of the SPD. • Noted. However, it is not within the 	<ul style="list-style-type: none"> • None. • None. • None. • None.

Report of Representations

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	<ul style="list-style-type: none"> • Regards that the need for HMOs is overstated. 	<p>scope of the SPD to provide for these.</p> <ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Environment Agency	<ul style="list-style-type: none"> • Recommend that the SPD includes a section on flood risk and makes reference to the requirements of the GNSFRA and what would be expected to be included within a flood risk assessment (FRA) as part of any planning application. 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
Historic England	<ul style="list-style-type: none"> • Notes that within the Article 4 area, 'there are a few heritage assets, namely listed buildings' and would therefore 'welcome a paragraph within the HMO SPD that relates to heritage assets and the need to conserve and where possible, enhance their significance, including their setting.' Additionally, would also 'recommend including a paragraph detailing when listed building consent will be required and where to access additional information from Historic England's website.' 	<ul style="list-style-type: none"> • Noted. 	<ul style="list-style-type: none"> • None.
HS2 Ltd	<ul style="list-style-type: none"> • 'Have no comment to make on the HMO SPD.' 	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A
Natural England	<ul style="list-style-type: none"> • 'Do not wish to comment.' 	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A

Report of Representations

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Severn Trent	<ul style="list-style-type: none"> Have 'set out some general guidelines and relevant policy wording that may be useful' to the SPD. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> None.
The Toton and Chilwell Neighbourhood Forum	<ul style="list-style-type: none"> Is concerned that the current wording will 'cause small HMO conversion developments outside the Article 4 Area'. States that 'no consideration is given as to how long a property has to be single occupancy before it is considered to be a change of use' and that 'it is therefore possible that the new houses built around the Toton Tram stop (and elsewhere outside the Article 4 Area) could immediately be converted to small HMOs and not be subject to Planning.' As a result of the above points, suggests changing the text of the Table on Page 5 from 'Permission is only needed within the Article 4 Area' to 'Permission is needed within and outside of the Article 4 Area.' 	<ul style="list-style-type: none"> Noted. This is not relevant to the SPD. Noted. Permitted Development rights are only removed within the Article 4 area. The Article 4 Direction has already been adopted and will not be extended at this point. 	<ul style="list-style-type: none"> None. None. None.