**Houses in multiple occupation (HMOs) Supplementary Planning Document (SPD): public consultation**

Bath Preservation Trust

October 2021

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| **Note** | **We currently have a policy that HMOs should not make up 10% or more of properties in a given area.** |
| **Question 1** | **Do you agree that this HMO concentration threshold is appropriate?** |
| Answer  | Yes  |
| Answer  |  |
| Answer  |  |
| Comment box | Please provide details to support your answer where applicable |
| **Note**  | **We are proposing to change how we measure the concentration of HMOs. We would stop measuring properties within a census output area, and instead measure all applications using a 100m radius from any property where a new HMO is proposed.** |
| **Question 2** | **Do you agree that it is fair for us to assess all planning applications using the 100m radius test?** |
| Answer  | Yes |
| Answer |  |
| Answer |  |
| Comment box | Please provide details to support your answer where applicable*Not having access to cited LLPG, appears to be from centre of building to nearest part of garden. Map5 has at least 2 missing blue spots.* |
| **Note** | **When measuring the 100m radius for the purposes of calculating the concentration of HMOs, we are proposing to measure from the centre of the application property, and to include any property whose boundaries fall partly within that 100m.** |
| **Question 3** | **Do you agree that this is a fair way to measure how many HMOs there are within the 100m radius surrounding an application property?** |
| Answer  | Yes |
| Answer |  |
| Answer |  |
| Comment box | Please provide details to support your answer where applicable*Saves arguments re proportion of property.* |
| **Note** | **‘Sandwiching’ refers to residential properties with HMOs on two or more sides, and any potential negative effects of this. It is generally our policy to refuse applications which would create sandwiching for neighbouring properties.** |
| **Question 4** | **Is the explanation of sandwiching, as set out in the SPD, easy to use and understand?** |
| Answer  | Yes |
| Answer |  |
| Answer |  |
| Comment box | Please provide details to support your answer where applicable |
| **Note** | **The SPD sets out how we plan to apply the HMO ‘sandwiching test’ for properties which are subdivided into flats.** |
| **Question 5** | **Do you agree that flatted developments should be assessed using the ‘sandwiching test’, as defined in the SPD?** |
| Answer  |  |
| Answer |  |
| Answer | No preference  |
| Comment box | Please provide details to support your answer where applicable*This section seems least clear of document.* |
| **Note** | **The SPD further states that even when HMO sandwiching would occur in flatted properties, we could take into consideration evidence that this might not be harmful to neighbouring residential flats. Typical evidence might include sound insulation measures, ambient noise levels and the location of bedrooms next to boundary walls.** |
| **Question 6** | **Do you agree that we should consider such evidence when deciding whether to grant permission for HMOs which would create sandwiching in flatted properties?** |
| Answer  | Yes |
| Answer |  |
| Answer |  |
| Comment box | Please provide details to support your answer where applicable*But achievability dependent on building construction and location, as well as individual mitigation (which may not be enough).* |
| **Note** | **The SPD sets out minimum sizes which we would expect to be provided for bedrooms and shared living facilities in HMOs.** |
| **Question 7** | **Do you think these sizes are reasonable?** |
| Answer  |  |
| Answer |  |
| Answer | No preference |
| Comment box | Please provide details to support your answer where applicable |
| **Note** | **Our proposed Local Plan policy states that HMOs should achieve an Energy Performance (EPC) rating of C or above. Exemptions to this requirement are set out in the SPD.** |
| **Question 8** | **Do you think the exemptions to this energy efficiency requirement are reasonable?** |
| Answer  | Yes |
| Answer |  |
| Answer |  |
| Comment box | Please provide details to support your answer where applicable |
| **Note** | **The SPD gives guidance on sound reduction and ventilation measures which we would expect to see in applications for HMOs.** |
| **Question 9** | **Do you think these recommended measures are reasonable?** |
| Answer | Yes |
| Answer |  |
| Answer |  |
| Comment box | Please provide details to support your answer where applicable*Individually welcome, but ventilation works against sound insulation.* |
| **Question 10**  | **Do you have any other comments on the Draft HMO SPD?** |
| Answer | Yes |
| Answer |  |
| Comment box | Please provide details to support your answer where applicable*SPD needs extra criterion for refusal:**Child-walking distance to junior/infant/nursery school MUST be strong contra indication**of suitability.* ***Local schools vitally important for their role in building/sustaining community cohesion & reducing traffic – both of which are supposed to be Council priorities.***  |