

Consultation Statement: Bedford Houses in Multiple Occupation Supplementary Planning Document

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Purpose of the statement

Bedford Borough Council has prepared a Supplementary Planning Document (SPD) in relation to Housing in Multiple Occupation to guide applications within the Borough. This includes those that will be required following the introduction of an Article 4 direction that will remove permitted development rights allowing a change from a dwelling (C3) to a House in Multiple Occupation (C4) within the urban area. Once adopted the guidance will become a material consideration for planning applications determined within the borough.

Part 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that, when adopting a Supplementary Planning Document, Local Planning Authorities (LPA) should prepare a Consultation Statement. This should include the following information:

- (i) The persons the local planning authority consulted when preparing the supplementary planning document.
- (ii) A summary of the main issues raised by those persons; and
- (iii) How those issues have been addressed in the supplementary planning document.

The Local Plan Regulations set out that LPAs should make the document 'available' for a minimum of four weeks for the purposes of seeking representations on the SPD. During such time, the document should be made available for inspection at the council offices and other appropriate locations and be

published on the local planning authority website in accordance with the Statement of Community Involvement, prepared by the Local Authority.

The Council produced and published that initial consultation statement on 8th June and published it on the Council's website as well as making a copy available in the Council's Customer Service Centre. It was available for a total of 8 weeks until Tuesday 4th August. Hard copies were also available for those requesting them. A copy of that statement may be found at Appendix E.

As a result of the Covid 19 pandemic, the Council's libraries were closed during the consultation period and social distancing measures were in place which discouraged face-to-face contact. As a result, copies were not made available at libraries but were made available by post.

Evidence gathering, initial engagement and pre-consultation

The preparation of the SPD has been informed by the findings of previous work undertaken on behalf of the Council to consider the need for making an Article 4 direction to remove the permitted development right that allows a change of use from an ordinary dwellinghouse to a small house in multiple occupation. The study was overseen by a project team from across Bedford Borough Council.

Together with the analysis of various data sets, the study was informed by a Consultation Strategy based on an initial stakeholder analysis. This established that the following stakeholders should be encouraged to engage in the evidence gathering for the Study, and then later the production of the SPD:

- community group representatives,
- higher education establishments,
- licensed operators of HMOs,
- lettings agents,
- Registered Social Landlords (RSLs)
- elected members, and
- residents of Bedford Borough (particularly those within the urban area).

In order to gather detailed evidence from those most knowledgeable about HMOs, consultation in the form of small focus groups was considered an appropriate starting point. Three focus groups were scheduled, comprised of the following:

- A. Higher Education Establishments and Registered Social Landlords
- B. Letting Agents and Licensed Operators of HMOs
- C. Community Representatives, Residents Groups and Elected Members

The focus groups took place on 24th June 2019 at The Castle Room, The Higgins between 10am and 4.30pm. Focus Group C for the Community Representatives, Residents Groups and Elected Members was attended by seven people, the other focus groups had no attendees. This lack of participation from the groups A and B is identified as a limitation to the work and phone calls were made to follow up with no positive response.

In order to reach a wider audience and ensure residents of Bedford Town and Kempston Town Wards are aware of and had an opportunity to participate in the Study, a drop-in event was organised for 4th July 2019. This was hosted at Borough Hall between 12 noon and 8pm.

This was advertised via press release, by informing local community groups, using Bedford Borough Council social media and both Bedford Borough and WYG websites. 22 people attended the drop-in event, with five feedback forms completed at the event, 2 received via post and 5 received via email.

In addition to questions on the exhibition boards, feedback forms were offered to attendees. These allowed attendees to share their views and raise any specific queries. Feedback forms were also displayed on the webpage for people to download and return via post or to the bespoke email address set up for the project. All feedback forms were requested to be returned by the end of July 2019, allowing four weeks for responses.

Preparing the SPD

The engagement and the findings of the study were instructive of the formulation of the SPD.

The management of HMOs rests with many different teams within the Council. To ensure advice within the SPD was consistent, the Council engaged internal staff of Bedford Borough Council in developing this SPD. This included officers from Development Management, Transport Policy, Infrastructure and Highways Development Control, Housing and Pollution and Refuse and Recycling. Each of these service areas considered the planning issues that should be addressed in a new SPD.

As a result of the findings of the Article 4 study, and the internal meetings and discussions, a first draft of the document was formulated. The document was subject to an informal internal consultation period during April 2020, prior to publication. Relevant officers were invited to make comments on the SPD. The comments received in summary were:

- Ensuring adequate/appropriate car and cycle parking standards
- Appropriate standards for accessibility
- Ensuring clarity around use and expectations of document
- Clarifications of implementation measures within SPD
- Enhancing protection of gardens and visual amenity/character
- Ensuring adequate/appropriate waste and recycling storage standards
- Inclusion of example conditions not considered appropriate
- Revisions to ensure clarity and avoid conflict with other (e.g. licensing) regimes

As a result of the comments received, the document was amended accordingly, and this formed the initial consultation statement (Appendix E).

Public consultation

The public consultation period was initially programmed to run between Monday 8th June and Tuesday 7th July. It was subsequently extended by an additional 4 weeks to Tuesday 4th August to allow additional time for comment in light of the restrictions in place due to COVID-19 and to send specific notification letters to RSLs, universities, letting agents and community groups who had originally been contacted as part of the HMO impact study.

Prior to consulting on the SPD, the LPA carried out a screening exercise in order to establish whether there was a need for a Strategic Environmental Assessment (SEA) and/or a full Habitats Regulations Assessment to be produced. Following consultation with the three statutory consultees (the Environment Agency, Historic England and Natural England), it was concluded that a SEA was not required, and the SPD would not need to be subject to a full Appropriate Assessment under the Habitats Regulations.

Who was consulted and How?

Hard copies of the Houses in Multiple Occupation Supplementary Document and Sustainability Appraisal Screening were placed for viewing in the Customer Service Centre. Hard copies were not placed in libraries as, during the 8 weeks these buildings remained closed due to social distancing measures. This is in accordance with the Council's temporary Statement of Community Involvement which was amended in light of the Covid 19 pandemic and agreed by the Council's Executive on 24th June 2020.

The following documents were available to view on the Council's website accessed from the Planning Policy pages:

- Draft Bedford HMO SPD;
- Sustainability Appraisal Screening;
- Details of how to respond.

Paper copies of the documents were also made available by post and a phone number and email address provided to request the documents.

Due to restrictions, the primary means of communication was via email. An emailed version of the letter (**see Appendix A**) including links to the relevant web pages was sent to the following groups where an email address had been provided. Where an email address was not provided, copies were sent via post:

- Statutory Bodies (Natural England, Environment Agency and English Heritage)
- Parish Councils within and neighbouring the Bedford Borough Council administrative area;
- Neighbouring authorities to include: Central Bedfordshire Council, Milton Keynes Council, Huntingdonshire District Council, East Northamptonshire Council and Borough Council of Wellingborough.
- General consultees, planning consultants and developers on the Council's planning policy database.
- Members of Bedford Borough Council and internal Council services.
- Universities, local letting agents and community groups first contacted during the initial HMO Impact Study.

The publication of the documents was promoted via:

- Press Release (**See appendix B**)
- The Council's social media channels (Facebook and Twitter)

As there was no public exhibition, the Council opened a dedicated phone line from 9am-8pm on 25th June to allow residents and other participants to discuss the SPD with officers. The phone line was promoted through the letters, emails and press release.

Issues raised and how were they considered in the final document

The council received 68 individual responses, the majority of which came from residents:

Group	Count	Percentage
Community Group	3	4%
Landlord	2	3%
Parish Council	5	7%
Private Individual	47	69%

Statutory	6	9%
Ward Councillor	5	7%
Total	68	

Issues raised:

A summary of the responses received during the consultation period, and the responses are set out in full in **Appendix C**. Within the responses, there were a number which had specific objections regarding a single property which is currently subject of an enforcement investigation and has not been identified. Where these have raised more general points, they have been included within the consultation comments.

There were high levels of support for the principle of both additional control and the principles within the SPD. On a general level, some residents felt there should be no further HMO development at all. Responses were principally from residents that live in areas¹ that correlate with those identified as having high concentrations of HMOs and where there is planning harm. Many of these responses cited issues including parking, anti-social behaviour (e.g. noise, drug-taking), and maintenance of the properties.

Several responses questioned the role of the document for residents and how they will be consulted on HMO-related planning applications in future. This was often included alongside comments regarding the existing licensing process and queries regarding how it will be enforced in the future and monitoring.

There were two objections received, both of which opposed the principle of the introduction of an Article 4 Direction asserting that the existing licensing regime was sufficient to control HMOs. Of these, one supported some of the principles that could assist when applied to larger HMOs but objected to policies that seek to control the concentration of HMOs.

A summary of the main matters raised, by principle, is outlined below:

Principle 1: HMO Concentrations

Measure A is intended to prevent harmful impacts due to a concentration of HMOs by using an allowable threshold of 30% HMO households to surrounding properties within a radius of 100m. Some comments suggested that the area should be smaller whilst others larger. The majority that commented on this principle considered 30% too high.

Officers note that some respondents appear to have misunderstood how the calculation works insofar as it measures the number of HMO households as a proportion of overall properties (counted by individual address points) within a 100m radius and is not a straightforward measures of the number of HMO properties as a percentage of the overall number of properties. This approach has been adopted as it allows assessment of expansions of individual HMOs which might have environmental or visual impacts for example. This would not be possible if a straightforward property measuring method were adopted. The assessment of HMO household numbers rather than HMO property numbers will also result in the allowable threshold of HMO properties in a 100m radius to be significantly lower than 30% when one takes into account that each HMO will contain at least three households.

¹ Where a full address was not supplied, information contained in the response that identifies the location of the respondent has been used to reach this conclusion.

With regard to reducing the percentage threshold below 30%, this level has been determined based on the evidence of harm found in the HMO impact report and is considered a reasonable threshold. There is not considered to be sufficient evidence or justification for lowering the threshold below 30%.

A number of respondents felt that allowing HMO properties to be opposite each other, particularly in terraced streets should be refused to avoid clusters.

In response, officers note that the impact report did not identify that as causing specific planning harm and such a measure would be difficult to justify given the intervening presence of a road diluting any impacts. It is proposed that the policy remains unchanged and is monitored.

Principle 2: Amenity

Matters raised included:

- Due to the number of people in one place, HMOs will increase the number of COVID-19 infections.
- Measures such as 'wipe clean' surfaces and bathroom specifications should be included.
- Importance of private amenity space (e.g. resist the loss of gardens)
- Questions regarding the role of National Space Standards v. licensing
- Comments regarding monitoring and enforcement

In response, officers note that the planning system has only limited control over internal arrangements and matters such as the control of surfaces and bathroom specifications is beyond its reach. Licensing does also have some control over bathroom facilities.

Principle 3: Parking

Parking was cited in almost all the responses from community organisations, parish councils and private individuals. Key comments include:

- CPZ is only in place during the day, issues with parking are at night outside operating hours
- Parking cannot be enforced
- No way to control parking
- Various details of inappropriate parking in reference to specific properties
- Bicycle parking levels are not high enough and should be based on bed spaces not rooms

In response, officers note that the parking requirements within the SPD are based on other standards across the Borough and it is important that planning guidance applies consistent policy.

Principle 4: Design

The design standards received relatively fewer comments than other sections.

- There was general support around Bin Storage with residents highlighting issues regarding vermin and bins being left out/not collected.
- Historic England, as a statutory consultee, requested that Listed Buildings were included within this section (Conservation Areas) to ensure that requirements were clear.

How has the document changed?

A summary of the changes made to the document is included at Appendix D. This details all the changes, together with the justification.

Appendix A: Consultation Letter

Please ask for: Ian Johnson
Direct line: 01234 718559
E-mail: hmospd@bedford.gov.uk
Date: 9th June 2020

Dear Consultee

Houses in Multiple Occupation: Supplementary Planning Document consultation

We are asking for your views on a new Supplementary Planning Document (SPD) relating to the development of houses in multiple occupation (HMOs).

HMOs are an important part of the housing mix within Bedford and Kempston and provide much needed low-cost accommodation. The new draft Supplementary Planning Document (SPD) aims to provide guidance on applications to convert, use or develop properties for HMOs. It aims to encourage balanced communities in Bedford and Kempston by preventing harmful concentrations of HMOs.

You may view a copy of the draft SPD and associated documents at the following webpage: www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/planning-policy-consultations/

If you are unable to use online facilities and would like to see a paper copy of the document please call 01234 267422 to make an appointment at the Council's Customer Service. Please only visit us in person if you really can't access a computer from your home. Strict social distancing measures are in place at the Customer Services Centre.

We will provide a paper copy of the document by post if you email us at hmospd@bedford.gov.uk or call 01234 718559. Our ability to print and post documents at this time is limited and we therefore request that you only ask for paper copies if you are unable to view or print the document online.

The consultation will run for four weeks between Tuesday 9th June 2020 and Tuesday 7th July 2020.

If you wish to discuss the content of the SPD we will be hosting a dedicated phone line on Thursday 25th June from 9.30am to 8pm. Please call 01234 718559 during those times and if you are unable to speak to someone immediately please leave a message and we will call you back.

Why We Are Consulting

The results of the consultation will help shape the content of the final published guidance.

How to comment

Please submit any comments you wish to make by email to hmospd@bedford.gov.uk or by letter to:

HMO SPD Consultation
Planning Services
Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford MK42 9AP

You have been contacted because your details are on the planning policy consultation database. This is because you are either identified as a specific consultation body in the Local Plan regulations 2012 or because you have requested to have your details on the database. If you wish for your details to be removed, please contact planningpolicy@bedford.gov.uk.

Responses to this consultation may appear on the council's website. For further information on data protection please visit www.bedford.gov.uk/dataprotection

Yours sincerely

Ian Johnson
Manager for Heritage and Planning Compliance

Appendix B: Press Release

COMMUNICATIONS DEPT.

TEL: 01234 276084

EMAIL: PROFFICE@BEDFORD.GOV.UK

FOLLOW US ON TWITTER: @BEDFORDTWEETS

Immediate release

Tuesday 9 June 2020

Attn: Newsdesk

15474

Have Your Say on 'Shared Houses'

Bedford Borough Council is holding a consultation on planning guidance setting out how 'houses in multiple occupation' (HMOs) or 'shared houses' can develop in Bedford Borough.

HMOs are an important part of the housing mix and can provide much-needed, low-cost accommodation.

The Supplementary Planning Document (SPD) under consultation aims to encourage balanced communities by providing guidance on applications to convert, use or develop properties as HMOs.

It sets out four core principles which any HMO development must meet. The first is 'Maintaining Balanced, Inclusive and Mixed Communities' and introduces a threshold for HMOs in an area. This is proposed to be set so that the total number of HMO households is no more than 30% of the total number of properties in a 100m radius of the application property.

The second sets out standards for HMO properties in 'Creating a Healthy Living Environment'; ensuring that they provide good quality accommodation for residents.

'Ensuring Safe Access and Adequate Parking' is the third, introducing specific cycle and car parking requirements.

The fourth is 'Creating Well-Designed Places', setting out measures to ensure that there are no harmful visual impacts from HMO development.

Cllr Henry Vann, Portfolio Holder for Planning said "Shared houses - HMOs - are a key part of the mix of accommodation on offer in Bedford Borough, particularly in the urban areas and immediate surroundings. It is important that we do everything we can to ensure that they are providing good quality housing for residents and are

playing their part in creating balanced communities in our towns. Please do get in touch and have your say.”

You can view the documents at www.bedford.gov.uk/hmoconsultation and respond to the consultation by email to hmospd@bedford.gov.uk or by writing to HMO SPD Consultation, Planning Services, Bedford Borough Council, Borough Hall, Cauldwell Street, Bedford, MK42 9AP. The consultation will close on Tuesday 7th July.

If you wish to discuss the content of the SPD the Council will be hosting a dedicated phone line on Thursday 25 June from 9.30am to 8pm. Please call 01234 718559 during those times and if you are unable to speak to someone immediately please leave a message and you will be contacted.

If you are unable to use online facilities and would like to see a paper copy of the document please call 01234 267422 to make an appointment at the Council’s Customer Service. Please only visit us in person if you really can’t access a computer from your home. Strict social distancing measures are in place at the Customer Services Centre.

The Council will provide a paper copy of the document by post if required and an individual is unable to view/print the document online; call 01234 718559 to find out more.

ENDS

Appendix C: Summary of comments received and the response

Officer Comments received as part of internal consultation prior to formal public consultation:

Who	Comment	Response
Transport Policy, Infrastructure and Highways Development Control	Para 3.1.2 – supporting evidence should also include proposed parking provision.	Added to list of requirements. Text updated to reflect comment
	Principle 3 – in relation to bullet point 3 – clarification regarding visitor parking this is per dwelling i.e. 4 on-street for every 10 houses.	The SPD seeks to apply parking standards applicable to dwellings at an equivalent rate to each HMO bedroom/household Text updated to reflect comment
	Principle 3 should also include a subsection c) which should state “any potential parking impact on existing on-street parking is demonstrated acceptable” it could be accommodated on street evidenced by a parking survey/or evidence of similar development parking/not is provided.	Change to principle 3 made and accommodated to clarify position in relation to BBC policies. Text updated to reflect comment
	Para 4.8.3 – should this say the loss/conversion of a potential bedroom may be required to accommodate internal cycle parking.	This has been incorporated into the changes suggested to this section by Development Management in respect of cycle parking and the street scene. This change has been incorporated
	Para 4.9.1 queries “2013” asking if it should be 2008.	The text on the Bedford Borough Council website states (https://www.bedford.gov.uk/parking-roads-and-travel/parking/street-parking/parking-permits/): <i>Every resident within the CPZ is eligible to apply for a resident parking permit for their vehicle(s), except residents of new developments of flats/apartments and houses constructed/adapted after 1 April 2008 or residents of a single dwelling, flat/apartment or house of multiple occupancy that has been formed as part of a conversion of a building or part of a building after 12 August 2013</i> No change required.

	Para 4.9.3, third bullet point should be expanded/amended to state that proposals for parking do not impact on neighbours on-street parking/visitor convenience i.e. one extended semi allowed at Appeal in sub-urban Kempston has resulted in about 7 cars all over the front garden outside on street in front of the adjoining semi.	Change incorporated into bullet points. Text updated to reflect comment
	Para 4.10.4 – add another bullet point stating “have access to a dropped kerb for bin crews”	The nature of HMO accommodation means that this could result in large areas of terraced streets needing dropped kerbs. This may not be practical and may have other impacts on the street scene. This change has not been incorporated.
	Para 4.6.2 – flagged subsection (b) “the property is within 400m walking distance (approximately a 5-minute walk) of a public open space.	Change incorporated in response to other comments. Text updated to reflect comment
	Para 4.9.1 – it has been checked with parking services who said that new residents in an expanded HMO would not be entitled to apply for a permit, as this would count as an adaptation to the existing property.	Noted- addresses internal comments made by Development Management and no changes to text required.
	Para 4.9.7 with reference to walking distance – this is what is suggested in Principle 2 – the property is within 400m walking distance (approximately a 5-minute walk) of a public open space.	Change incorporated in response to other internal comments and 400m distance included. Text updated to reflect comment
Development Management	Note that the guidance also to be used by planning officers to aid their assessment of such planning applications.	SPDs are part of the wider suite of planning guidance and will be used by planning officers to aid decision-making. Text updated to reflect this position.
	Add in additional bullet point to state “elevation plans where any extensions or new openings such as windows and doors are proposed”	Adds to clarity for applicants. Text updated to reflect comment
	The Use Classes Order section is currently misleading as it implies that there are some PD rights for	Noted- section has been updated to provide a link to the planning portal and edited including the removal of table 3.2 which

	<p>changes of use but we are taking them away for a large part of Bedford (via the Article 4). Table 3.3 is more helpful for the local context, although updates are required to provide clarity for the differences between the areas within/outside the Article 4 area.</p>	<p>listed these changes. The Article 4 text has been moved from Planning Policy to this section and table 3.3 has been updated accordingly.</p> <p>Text amended.</p>
	<p>Seek to avoid the phrase “will be supported” as this may be misinterpreted. Include reference to other policies and principles. Require clarification on locality at the end of part (b)?</p> <p>Need to clarify household and bedrooms for consistency across the document.</p>	<p>Principle 1 was intended to be read as a single policy element. It is agreed that it needs to be clearer that applications still need to meet other policies in the SPD and Local Plan. The principle has been updated to reflect this and other text suggestions.</p> <p>The footnote to the policy makes clear that bedrooms are used as a proxy for households for the purposes of the SPD. This helps to alleviate potential confusion between licensing and planning and simplifies matters for applicants.</p> <p>Text updated to reflect comment</p>
	<p>For calculating HMO numbers include other sources where necessary, such as council tax data.</p>	<p>Council Tax data was unreliable for the identification of HMOs during the preparation of the study due to the specific tax regulations (the requirement depends upon tenancy types). However, this has been amended to make clear that the list is indicative and other sources may be interrogated.</p> <p>Text updated to reflect comment</p>
	<p>Para 4.5.6 – what does “letting within” mean?</p>	<p>Text amended- typographical error.</p>
	<p>Bathrooms- for planning you either will apply for a HMO for between 3-6 people or HMO for over 6 people. We sometimes make assumptions on number of occupiers based on the room size and/or if the plans show single or double beds, but we may not always be given this information.</p>	<p>Section removed- likely to duplicate requirements for licensing/ create confusion on standards and number of occupiers.</p> <p>Text updated to reflect comment</p>
	<p>Para 4.6.2 relating to on-plot parking –we should not be losing garden to parking. To leave it in implies that we value parking over garden when that is not the case.</p>	<p>Text amended to clarify BBC position in relation to on-plot parking.</p> <p>Text updated to reflect comment</p>

	<p>Principle 3 – need to add to the line that says “does not result in the loss of all or the majority of existing garden space” to ensure that gardens are given the protection they need.</p>	<p>Added to principle to ensure accordance with section on private amenity space.</p> <p>Text updated to reflect comment</p>
	<p>Para 4.8.3 – what about having regard to the visual amenity and character of the place too? We so often have developers putting Sheffield stands in the narrow frontages, which clutters and visually detracts from the streetscape. I think this section needs to be enhanced to consider public realm and streetscape impacts.</p>	<p>Section amended to reflect changes to street-scape and public realm. Linked with proposed changes from internal transportation team and text redrafted.</p> <p>Text updated to reflect comment</p>
	<p>Para 4.9.1 – what about existing HMOs that just expand? Presumably, new tenants into those existing but expanded properties are still eligible for parking permits. Can this be checked?</p>	<p>See transport comments.</p>
	<p>Para 4.9.5 amend to read “Where proposals involve the conversion of a property where sufficient on-site parking is not feasible, discussions with the local planning authority must take place as early as possible to see if there is capacity elsewhere so that the demand for parking can be satisfactorily managed as with proposals that are less than 400m from the edge of the CPZ, parking beat surveys may be required to support an application.</p>	<p>Text updated to reflect comment</p>
	<p>Para 4.9.7 minor text changes. Specify a walking distance: 100m, 500m?</p>	<p>400m as per other distances specified</p> <p>Text updated to reflect comment</p>
	<p>Para 4.10.1 minor text changes to read as “A HMO is likely to generate more waste than a regular family dwelling. It is important that the location, design and the size of bin storage area is suitable, so as not to impinge on the amenity of HMO occupants or their neighbours</p>	<p>Text updated to reflect comment</p>

	and not to detract from the general amenity and character of the area.”	
	Para 4.10.3 to be amended to say “Often, when a property is converted to multiple occupation, ground floor living rooms are converted to bedrooms. Waste that is placed outside the windows of these bedrooms can create smells that in a normal dwelling (where the bedrooms are upstairs) would not normally lead to a nuisance. There is also the issue of noise associated with the movement of bins and placement of rubbish into bins adjacent to bedroom windows. These issues can, in turn, result in waste being left in unsuitable locations beyond the property boundary; for example, on the street.	Text updated to reflect comment
	Para 4.10.5 minor text changes, addition of “also” to line 4 and deletion of “where possible”	Text updated to reflect comment
	Para 4.10.7 – it may be better to refer to the Waste SPD and add any successor guidance as a caveat to avoid being bound by the sizes quoted here in this SPD in the event that it is not updated for but waste standards change.	Note that the SPD has been formally withdrawn and will be replaced by a technical guidance note. Section has been updated to incorporate comments from Council’s waste services and reference made to the BBC website where the latest operational guidance can be obtained.
	Para 4.10.8 – Again this should be caveated that the dimensions may be subject to change of the waste guidance changes.	Change made.
	Para 4.11.2, fourth bullet point – is this correct, or do we mean obscures the property from the street because of storage in the front setback space of a property?	Text updated to reflect comment
	Opposed to including a section on draft conditions, this is not necessary and it could give individuals the presumption that if they submit details up front that would be covered in those	The section on example conditions has now been deleted.

	conditions that permission would be granted.	
Housing and Pollution	<p>Table 3 Use Classes Order should include the clarity on s257s not being classed as HMOs for the purposes of a Class C4 use.</p> <p>Section 257 HMOs are only HMOs due to poor conversion and the relevant HMO licences do not consider the number of occupants or households. Essentially, they are just the same as purpose-built blocks of flats. They do not bring about the same issues as traditional HMOs.</p>	Table 3 deleted as part of feedback from Development Management and S257 HMOs are not included for the purposes of the calculations under Principle 1.
	<p>Amendments to the description of Footnote 6 to read as “For the purposes of this measure, properties that have been converted into flats, known as “Section 257 HMOs” will not be counted as an HMO. These properties are part of Bedford Borough’s additional licensing scheme but are not considered HMOs for the purposes of a Class C4 definition.</p>	Footnote amended as part of other comments. Clarity that they are part of the licensing has been included.
	<p>Text beneath para 4.3.7 – it might be worth adding to this to say that a licence may be granted for an HMO but for a shorter period than normal to allow for planning permission to be applied for. There is a specific tribunal outcome on this which states that planning matters should be considered when issuing a licence. It has only been applicable in a few cases but with the Article 4 extending things to smaller HMOs we could have a lot more scenarios where we issue for 2 years for example, and then have to refuse to re-issue as planning consent has not been given.</p>	This is a useful clarification and has been incorporated into the SPD. The new paragraph reference is 4.3.5
	<p>Table 6 – perhaps worth commenting that these are our minimum standards. For 2</p>	Table updated- paragraph 4.4.6 makes clear these are minimum and the table headers also state minimum.

	<p>people, the legal minimum is 10.22.</p> <p>There are currently two layers on the GIS mapping tool. Mandatory HMOs are in blue and Additional HMOs (including s257s) are in red. It should be quite straightforward to separate the Additional HMOs out so that s257s have their own layer. This would make it easier for developers and planners to view the relevant HMOs as part of the calculation for applying for C4 use. It is conceivable that the layers can be updated at least every quarter and maybe it is worth putting in a caveat to say that the layers may not be fully up to date.</p>	<p>The text re: GIS has been updated as this now includes information on households which was not available during the initial drafting stage. Other text changes clarify that the council's data is that which will be used which address this point.</p>
Refuse and Recycling	<p>Para 4.10.4 – amendment to first bullet point to read as “Secure and unobtrusive – i.e. accessible to both residents and collectors (where required), but not to others).</p> <p>In relation to the third bullet point which says “(to allow residents to place bins at the collection point)” – in practice this is unreliable as people don't remember to put the bin out or bring the bin in, and this usually ends up being treated as 'serviced' collection points where we go and get the bins from the bin store and put them back.</p>	<p>First bullet amended. Bullet 3 amended to read: “or the property to become a serviced collection point”</p> <p>Text updated to reflect comment</p>
	<p>Para 4.10.6 – ask that “no shingle/gravel” is added.</p>	<p>Text updated to reflect comment</p>
	<p>Addition of text under 4.10.7 to state: “Where it is not practical to provide separate bins for each household, provision should be made communally for shared bins for both waste and recycling. The total minimum volume of bin storage for each household proposed should be calculated at the rate of:</p>	<p>Climate change SPD has been formally withdrawn.</p> <p>The proposed text has been added to the relevant paragraph.</p>

	<p>180 litres of storage for refuse; 240 litres of storage of recyclables; 240 litre of storage of garden waste (where applicable). A bin storage area should provide enough space for the required number of bins plus space for them to be easily accessed by residents and manoeuvred by collection crews.” – This is current guidance on capacities to be provided for all housing types. Appendix C Refuse Arrangements in New Housing of Climate Change SPD needs reviewing as it is now out of step with operational policies.</p>	
	<p>Para 4.10.9 – in relation to design – the design requirements of SPD still good to use – just need to be updated with best practice examples.</p> <p>The addition of the following text: “They should also discourage the dumping of large/bulky items. Item on maintenance of bins and bin store areas e.g. communal bins in particular should be cleansed annually to prevent odour, bin store areas should be swept regularly and kept clear of litter, large items removed as these prevent bins being emptied regularly leading to build ups of waste which create a nuisance to residents and adjoining properties and harm to the street scene.”</p>	<p>Internal discussions have clarified that the council can’t impose a (planning) requirement that they are cleansed annually by condition because that’s not reasonable or necessary (in planning terms) as it could be dealt with under other legislation (e.g. env health or possibly even a condition of a license?)</p> <p>No change required.</p>
	<p>Para 4.10.8 – the addition of “approximate” to read “the approximate dimensions of typical wheeled bin containers...”</p> <p>Amendments to table – first column, first row – change from 140 to 180; first column, third row – change from 260 to 360.</p>	<p>Text updated to reflect comment</p>

Number	Organisation	Type	Comment	Response
1	Historic England	Statutory	<p>We have reviewed the draft Supplementary Planning Document and very much welcome the preparation of this document to support policy in the Bedford Local Plan, provide guidance to developers, and help guide the preparation and assessment of future planning applications on the site. The document provides a thorough basis for planning in respect of this specific topic area.</p> <p>We suggest that the policies referred to in paragraph 2.1.3 should also include policies for the historic environment. We continue to suggest that a section is also included on Listed Buildings. We note footnote 16 refers to listed buildings but this could easily be missed. It would be helpful to have a subheading for listed buildings, as is the case for Conservation Areas. This could highlight the potential constraints in relation to conversion to HMO for listed buildings and signpost the need for Listed Building Consent where relevant.</p>	<p>Support for the SPD is noted. Listed buildings have their own statutory protections and protective policies within the Local Plan. Changes to the introductory text will be made to highlight the importance of seeking specialist advice on the conversion of Listed Buildings and signpost to these policies.</p>

Number	Organisation	Type	Comment	Response
2	Environment Agency	Statutory	<p>We consider the principles of the Houses in Multiple Occupation (HMO) Supplementary Planning Document (SPD) to be sound. However, improvements could be made by also considering flood risk. Houses in multiple occupation have specific flood risk issues that could be addressed in the SPD to supplement the policies in your Local Plan.</p> <p>We recommend the following:</p> <p>New HMOs within an area at risk of flooding (from any source) shall:</p> <ul style="list-style-type: none"> • Not provide ground floor sleeping accommodation where internal flooding is predicted. • Provide an appropriate evacuation plan to ensure that there is a safe means of access and egress for all residents in a flood event. This should include a named person responsible for maintaining and updating the plan. Where a means of safe access and egress to an external location is not possible, proposals for new HMOs must demonstrate that an area of communal safe refuge is available within the building. This could fit within Principle 3 of the SPD – ensuring safe access to help deliver Local Plan 2030 Policy 92 – Flood Risk 	<p>Support for the SPD is noted. It is not considered a specific policy on Flood Risk is required. However, flood risk will be added to the general principles regarding safety and well-being. The detailed elements of the requested change could be applied as a condition to permissions that are granted for properties that are within flood risk zones.</p>

Number	Organisation	Type	Comment	Response
3	MARA Residents Association	Community Group	I wholly support the introduction of the Supplementary Planning Document. But would like the following observations/comments/suggestions to be noted: Believes that Article 4 Directive had already been confirmed. Considers that the scope of the document should be extended to include all rental accommodation and a Selective Licensing regime is required. Parking Provision and Surveys mandatory in all areas and a car free development should not be considered if it is in the CPZ- notes current parking issues in these areas. Highlights potential impact of further changes to Permitted Development Rights (PDR) and conversion of vacant high street units. Would like to see additional underground parking options.	Support Noted. The SPD is intended to provide guidance for those making a planning application which will be required once the HMO is in force. No planning permission is required to create a rental property and therefore the SPD cannot be extended in scope to cover this element. The comments on parking are noted. However, based on current council policy in respect of not providing parking permits for new properties in the CPZ no changes are required to the text of the SPD at this time.
4		Private Individual	Response shares concerns of HMOs within the Ford End Road area of Bedford. Notes number of illegal HMOs and evidence of antisocial behaviour, parking and amenity. Strongly feels the council needs to look at where HMOs are located.	Support for stronger policy control noted. No changes required.
5		Private Individual	Believes that the Poets area has too many HMOs and there should be no more. Notes antisocial behaviour.	No change required.
6	National Grid	Statutory	We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.	No change required.
7	Transport for London	Statutory	No comments	No change required.

Number	Organisation	Type	Comment	Response
8		Private Individual	<p>Whilst HMOs are an important part of the housing mix in Bedford, I believe that the following Minimum Standards be set by the Council:</p> <p>a) Each house should be registered with the council.</p> <p>b) There should be minimum standards imposed: i.e. suitable bathroom facilities to match the number of residents, heating, cooking facilities etc</p> <p>c) These should be written and agreed in a document at each letting to a tenant. (a Standard Form provided)</p> <p>d) They could be inspected at random intervals, i.e. if there are complaints from neighbours. There should be remedies, if they fall below the minimum standard. I.e., arrangements for temporary housing / say, should a roof fall in or other maintenance is needed.</p> <p>e) Are there still properties where large numbers of shift workers share beds, possibly three for a bed over twenty-four hours?</p>	<p>These matters are controlled by the licensing regime operated by the Council's HMO Licensing Team. No changes to the SPD are required.</p>
9		Private Individual	<p>Notes the Poets area is at capacity for HMOs. Does not want any further HMO development.</p>	<p>Noted. The Article 4 and SPD are intended to help control the number of HMOs. No change required.</p>
10		Private Individual	<p>Supports the inclusion of the Abbeyfields estate within the boundaries of the Article 4 Area and additional controls for HMOs in this area through the SPD.</p> <p>Notes that this area has seen an increase in properties being let as HMOs and issues such as parking. Notes that some properties are being</p>	<p>Support noted.</p>

Number	Organisation	Type	Comment	Response
			used as a care facility. Welcomes additional planning controls for HMO's.	
11		Private Individual	These dwellings change the nature of an area and should not be centred in one location. There should be a maximum permitted percentage to ensure an area does not become overwhelmed.	The SPD contains a percentage threshold. No Change Required.
12	MARA Residents Association	Community Group	MARA supports the introduction of the Supplementary Planning Document with amendments. Supports mixed housing but notes poor management and growing imbalance of types of development including hostels and residential institutions. Supports the 30% Cap but would prefer 25% as at 30% there could still be 1/3 properties developed within 100m. This would help limit the density of the population in an area. Queries how the radius will be applied. Requests clarification that this is straight line and any part of an HMO boundary within the radius will be included. Highlights issues regarding transmission of diseases and would like to see additional emphasis on outdoor space and ventilation and controls to ensure hard surfaces.	Support is noted. The 30% cap is applied as a ratio for households e.g. a single-family home is equal to 1, but a 5 bed HMO is 5. This provides a more accurate way to manage the cumulative impacts, including population density. It does not mean 1/3 properties would be able to be converted to HMOs. Clarification on the radius to be made clearer. Ventilation is contained within the Principles and the explanatory text can make clear this applies to the whole property. Planning is unable to control the surfaces within a building.

Number	Organisation	Type	Comment	Response
13		Private Individual	<p>General support. However, notes following concerns:</p> <p>1) No commentary on Toilets / Bath / Showering facilities. Aware that there are other regulations regarding these facilities, but reference should be included as a minimum here. 2) No commentary is provided with respect to wheelchair access. It cannot be assumed that all HMO residents will be mobile and again a comment should be included. Several disabled people find it difficult to afford accommodation generally and this would seem to exclude these as an option.</p>	<p>As noted, bath and showering facilities are covered by licensing regulations and are based on the proposed number of occupants (rather than rooms). A cross reference to the latest guidance will be made more explicit within the text. Noted that accessibility is a problem. Whilst HMOs are predominantly conversions of existing properties, reference to adaptation/wheelchair accessibility will be made in the text to encourage this where feasible to do so. It would not, however, be reasonable in planning terms to require that all HMO development make provision for disabled access. It should also be noted that for new build residential properties, the building regulations would require that the principal access must be level or have a ramp and downstairs toilet. Extensions to HMOs may also need to comply with building regulations and disabled access provisions as applicable.</p>
14	Natural England	Statutory	No comments	No change required.

Number	Organisation	Type	Comment	Response
15		Landlord	<p>Objects in principle to introduction of Article 4 to remove rights to convert houses to small HMOs including: need to gain separate permission and licence.</p> <p>Paragraph 1.1.2 The use of noise complaint data to justify the Article 4 is inappropriate.</p> <p>Paragraph 3.3.1 The Article 4 Direction will put Bedford at a disadvantage compared to other towns.</p> <p>Paragraph 3.5.1 It is wrong that for applicants to have to spend money on both planning applications and HMO licenses.</p> <p>Paragraph 4.1.2 Requests clarity as to what are 'unsympathetic security measures'?</p> <p>Paragraph 4.2.3 - considers the accuracy of the data sources to be used to calculate the number of HMO properties to be flawed.</p> <p>Paragraph 4.2.4 - HMOs should only be counted if the whole property falls within the 100m radius. Method also discriminates against low-density housing areas.</p> <p>Paragraph 4.3.1 - Existing problems will not be dealt with through further planning regulation. Council must adopt policy of enforcing current HMO guidelines.</p> <p>Paragraph 4.3.4 - Further regulation will act as a further burden in an already heavily regulated sector.</p> <p>Paragraph 4.3.7 - It is deplorable that money might be spent on getting a licence without any guarantee of a favourable result, this is evidence</p>	<p>The respondent objects, in principle, to the removal of permitted development rights through an article 4 direction. It should be noted that the SPD is intended to provide planning guidance should an Article 4 be made. The purpose of the SPD is set out within the document and is intended to ensure consistent planning decisions. The intention is to control HMO development, not prevent it altogether.</p> <p>1.1.2 The study draws on a range of data to reach a final recommendation and does not solely rely upon complaint data.</p> <p>3.3.1 The objection to the Article 4 is noted and recorded under the relevant consultation process which also addresses the circumstances in which they can be used. There are a range of different Article 4 directions in place locally for HMOs including Milton Keynes and Northampton.</p> <p>3.5.1 The licensing and planning regime are separate processes. The SPD provides clarity in respect of temporary licences that demonstrate a property meets the safety and other legal requirements to operate.</p> <p>4.1.2 Unsympathetic security measures are changes such as bars on windows and poor quality fencing. The SPD draws on the conclusions of the WYG report which demonstrates planning harm where there is an over concentration of HMOs; this cannot be controlled through the licensing regime.</p>

Number	Organisation	Type	Comment	Response
			<p>that the Article 4 serves only to increase Council revenues.</p> <p>Paragraph 4.4.1 - Considerations regarding whether a property may be suitable for HMO use are already made when considering a licence application.</p> <p>Paragraph 4.4.6, 4.4.7 - 4.5.7 - The licensing scheme already provides a robust framework through which enforcement may occur.</p> <p>Paragraph 4.6.2 - If available amenity space nearby is to be a requirement then Council should ensure that public open space is available and provide more spaces. The current offering Of Bedford Town centre is disappointing and Council has been selling off small parcels of land.</p> <p>Paragraphs 4.6.3 - 4.9.7 - Unreasonable to expect parking to be provided in most central HMO properties and if required, Council should be investing and providing them, not passing the problem to others. The costs involved are so hindering that it is doubtful any new HMOs would be approved or applied for at all.</p> <p>Paragraph 4.9.8, 4.10.1 - 4.10.12 - Modern living requirements mean that satellite dishes may be required and HMO guidelines advise that letterboxes are placed outside to avoid arson. The issue of poorly located and designed waste storage can already be addressed and enforced through current HMO guidelines which specify high standards for things such as bin areas.</p> <p>Paragraph 4.11.1 - 4.12.4 - Comments on design are entirely subjective and it is natural and</p>	<p>4.2.3 The method of measuring HMO concentration uses all available data sources and is considered reasonable and proportionate to the purpose. All planning decisions take into account material considerations when reaching a decision.</p> <p>4.2.4 As with 4.2.3, the Council will apply the principles in the guidance reasonably and proportionately and, in low density areas there may be examples where, even if the 30% threshold was breached because there were only very few properties used in the count, other material considerations may mean that the benefits of granting permission for the property to operate as an HMO outweigh any potential harm. The reality is, however, that most HMOs are in relatively high-density built-up areas. It is considered reasonable to count an HMO of any part falls within the 100m radius.</p> <p>4.3.1 The measures cannot apply retrospectively and this guidance seeks to deal with issues that the licensing regime cannot and work with developers in a proactive way to provide high quality HMO development.</p> <p>4.3.4 The guidance seeks to deal with issues that the licensing regime cannot and work with developers in a proactive way to provide high quality HMO development.</p> <p>4.3.7 . The licensing process is a separate regime and should the Article 4 direction be</p>

Number	Organisation	Type	Comment	Response
			<p>normal that older materials are replaced by modern environmentally alternatives. Notes loss of old sash windows as an issue but fails to acknowledge installation of UPVC double or triple glazing as a huge environmental benefit thus reducing carbon footprint. Wording gives no credence to climate emergency. Inappropriate for Council to cite other elements of new build planning law at its convenience to be used for HMOs. The above range of points serves to hinder the efforts of citizens to become carbon neutral.</p> <p>With regard to the worked examples, also considers these to be unfair and mathematically skewed to make it deliberately difficult to meet. Raises particular concerns about converting HMOs to households rather than counting as a single property.</p> <p>The response also raises a series of questions in respect of the WYG report, which evaluated the impact of HMOs across the urban area of Bedford - these are addressed in the consultation report on the Article 4 Direction.</p>	<p>brought into force it would be appropriate for a conditional licence to be granted to ensure that the property meets the necessary safety checks prior to occupation. That does not necessarily prejudice the outcome of the accompanying planning application - it is perfectly possible for a conditional licence to be granted which could not then be implemented if planning permission was subsequently refused. It should be noted that a condition of granting an HMO licence is that the property has the necessary planning permissions. It is ultimately the developer's decision if they wish to apply for a licence before they have a planning permission.</p> <p>4.4.1 This section provides additional guidance for those seeking planning permission and is broader in scope than the licensing considerations.</p> <p>4.4.6, 4.4.7 - 4.5.7 The guidance seeks to deal with issues that the licensing regime cannot and work with developers in a proactive way to provide high quality HMO development. The SPD also allows for all matters to be considered in the round before making a final decision.</p> <p>4.6.2 Open Space access is consistent with other guidance e.g. for flats.</p> <p>4.6.3-4.9.7 The parking standards are consistent with other types of development</p>

Number	Organisation	Type	Comment	Response
				<p>within the CPZ and beyond and are designed to prevent parking harm in residential areas.</p> <p>4.9.8 While it is accepted that satellite dishes and multiple external letterboxes may be necessary and may be considered part of modern living, they nonetheless may still cause visual harm, particularly where their frequency is increased. The evidence of harm is set out within the HMO impact report, which references a series of site visits across Bedford. The HMO Licensing scheme has only very limited control over waste storage and cannot control visual harm whereas the planning system has an increased ability to do that.</p> <p>4.11.1-4.12.4 The comments raised in relation uPVC windows relate to conservation area impacts, where there are existing local and national guidance to protect the historic environment. In many older buildings uPVC windows are inappropriate and may result in damage to the building's fabric and environmental improvements can be made by the installation of secondary glazing or by appropriately designed double glazed timber windows which do not involve the use of high carbon plastics. The environmental benefit of replacing single with double glazing would also be weighed in the planning balance when considering any planning application.</p>

Number	Organisation	Type	Comment	Response
				<p>With regard to the worked examples provided, the calculation method has been proposed because it provides a transparent and consistent approach to considering the acceptability of an increased concentration of HMOs in an area. It is considered to be objective and based on evidence so is not mathematically skewed. The 30% limit was based on looking at areas where harmful impacts had been identified and what an acceptable threshold of HMOs was considered to be in light of that harm. Using a calculation based on households is one that has been used successfully by other local planning authorities, including Milton Keynes, and allows assessment of increasing the size of individual HMOs which may have knock-on impacts related to matters such as waste storage, parking etc</p>

Number	Organisation	Type	Comment	Response
16		Private Individual	Supports introduction of SPD and Article 4 direction to manage over saturation of HMOs in areas. Notes current issues in immediate area of conversion to HMOs including parking.	No change required.
17		Private Individual	Supports the plan to limit HMO housing. Notes various anti-social behaviour in the vicinity of Chaucer Road.	No change required.
18		Private Individual	General support for SPD but would like to see no further HMOs developed within the Poets area. Highlights that there are some advantages, but also many disadvantages. Areas of concern include parking, maintenance and anti-social behaviour. Notes that HMO development within the Poets area is not sensitive to the Conservation Area.	Officers do not consider there to be any justification to refuse all HMO development in any one single area. The SPD is designed to introduce a greater degree of control so that harmful impacts are addressed wherever possible. No changes required.
19		Private Individual	Support for implementation of an Article 4 Direction. Highlights range of issues affecting Kempston such as antisocial behaviour and parking noting that over concentration has a cumulative negative impact.	No change required.
20		Private Individual	General support. Asks if the proposal can be applied to existing HMOs in Bedford? Cites issues with neighbours including antisocial behaviour, drug dealing and substance abuse. In addition to fly tipped large furniture, bins left out permanently and lack of parking. Notes issue of unregulated houses and neglect of landlords. Welcomes the plan to restrict applications to limit HMO numbers in specific areas and those in	The proposals cannot be applied retrospectively as properties that are presently in use as HMOs will retain this use once an Article 4 direction is introduced and therefore there will be no requirement for these properties to seek planning permission for the use retrospectively. No changes required.

Number	Organisation	Type	Comment	Response
			proximity to each other and proposals to spread out existing HMOs throughout town.	
21		Private Individual	Supports the making of the Article 4 and additional planning control. Highlights need for planning policies to control numbers of HMOs in local area in Kempston and highlights clusters in small areas <100m that cause problems with noise, anti-social behaviour and parking.	Support noted. No changes required.
22		Private Individual	Accepts need for some HMOs. Highlights lack of ownership of property by tenants and associated issues e.g. antisocial behaviour. Considers only 1x HMO per road/street is enough. Highlights issues of parking of other vehicles e.g. vans. Feels smaller properties e.g. terraced homes are too small for conversion and that no conversions should be permitted without off-road parking for the number of residents. Disagrees that proximity to open space means there is no requirement for private amenity space. HMOs should be provided on brownfield sites as part of any planned new sites. Objects to the conversion of larger homes that will increase density.	The evidence prepared to support the proposal for an Article 4 Direction does not provide enough evidence that more than 1 HMO on a street caused harm, but rather that harm occurred when there were higher concentrations in a local area. Therefore, there would not be evidence to justify limiting HMOs to 1 per street. The proposed SPD seeks to ensure that homes are large enough to accommodate conversion which may mean that many smaller homes will not be suitable. The approach to open space is consistent with the planning policy for other tenures, such as flats. No changes required.

Number	Organisation	Type	Comment	Response
23		Private Individual	Notes that among attendees at local church, it is common for single adults to want to share houses together as a part of healthy community. The HMO limits being only to 2 adults in Bedford has proved problematic for quite a few of my friends, and so my main suggestion would be a review of this to increase to 3 adults, as it is in other areas of the UK. This would enable landlords to rent to groups of 3 adults or families without having to make significant adjustments which would make a significant difference to the young adults in my community. Supports other aspects e.g. the regulations on sizing of rooms and appropriate parking etc. I think this will all help to make Bedford safer.	At present no permission is required to let a property to up to 6 unrelated adults. The Article 4 Direction will not prohibit houses being let to more than 2 unrelated adults but require that properties have planning permission to operate in this way. No changes required.
24		Private Individual	Notes there is a need for HMOs to provide affordable housing in the area. Notes own property near the university and student accommodation which can cause problems with anti-social behaviour, noise, fly-tipping waste and parking issues. Own property is 'sandwiched' by HMOs. Notes that HMO accommodation has poor social space (conservatory) and considers that appropriate space is important. Notes improvement to amenity whilst property has been vacant during the lockdown period.	The SPD contains proposals to ensure that suitable social spaces are provided, in addition to avoiding the 'sandwiching' of private housing. Comments noted. No changes required.

Number	Organisation	Type	Comment	Response
25		Private Individual	Supports the greater element of control over the creation of HMO's especially in the Conservation Areas. Notes that the existence of many larger properties in Bedford have historically been deemed suitable for conversion. If the conversion is done well & the outward appearance of the property remains largely the same & the number of residents is such that they do not impact on the amenities of surrounding residents then the conversion is a positive one and adds to the social mix within the community & provides housing to more people. However, highlights that there are examples of lack of care of property particularly outdoor space and parking issues. Notes the proposed document sets out to address some of the above issues and I am glad to see the Council has set out clear guidelines to control the creations of future HMO's.	Comments noted. No change required.
26		Private Individual	It may be that the present COVID rate of infection in the Borough is exacerbated, in part, to multi occupation of houses and accordingly I think that this survey should be delayed until the COVID outbreak is better understood.	There have been no studies in Bedford Borough in relation to the spread of COVID-19 and HMOs. The SPD does, however, seek to provide good quality internal living accommodation and external amenity space considerations. No changes required.
27		Private Individual	Supports additional regulation for HMOs. Highlights concerns including inspection and health with Covid-19 and potential impact on inspections. Objects in principle to further development within Bedford.	Inspections are linked to the Licensing regime rather than planning considerations. No change required.

Number	Organisation	Type	Comment	Response
28		Private Individual	Support for implementation of an Article 4 Direction. Highlights range of issues affecting Kempston such as antisocial behaviour and parking noting that over concentration has a cumulative negative impact.	No change required.

Number	Organisation	Type	Comment	Response
29		Private Individual	<p>Recognises the need for HMOs as part of housing mix. Considers that the document excludes nearby residents from the process citing existing changes of use. Notes that conversion close to own property has resulted in increases in anti-social behaviour and the change of HMO into a care home. Questions how HMOs can accord with Local Plan Policy 2s(ii) to have a positive relationship and how this can be enforced. Question also raised in respect of enforcement re: parking, behaviour of tenants and relationship with licencing particularly in respect of tenant management and behaviour. Queries current consultation process in respect of planning permission noting that at present neighbours are not consulted. Objects to 30% threshold of properties as this is too high. Objects to the prior approval of a licence for a property that would not have planning permission. Objects to parking provision on the grounds this is not high enough. Objects to lack of monitoring of SPD. Questions why restrictive covenants have not been enforced on new build estates.</p>	<p>At present no permission is required to convert a property to a 6 bed HMO. The Article 4 direction will remove this permitted development right to ensure that proposals for new HMOs are considered against the policies within the SPD. The threshold for HMOs is based on the ratio of HMO households: non-HMO properties in an area rather than just properties. This would mean that converting 30% of properties to HMOs in a 100m radius would not be supported by the SPD. It also allows the impact of adding additional bedrooms to HMOs to be considered.</p> <p>The licencing process is a separate regime and should the Article 4 direction be brought into force it would be appropriate for a conditional licence to be granted to ensure that the property meets the necessary safety checks prior to occupation. That does not necessarily prejudice the outcome of the accompanying planning application - it is possible for a conditional licence to be granted which could not then be implemented if planning permission was subsequently refused. It should be noted that a condition of granting an HMO licence is that the property has the necessary planning permissions.</p>

Number	Organisation	Type	Comment	Response
				<p>Reports of ASB can be made to the Council at any time and will be investigated by the Community Safety team. All HMO Licenses contain ASB conditions which require license holders to ensure that they are effectively managing the conduct of those that reside in their properties</p> <p>Parking provision is based on other standards across the Borough and it is important that planning guidance apply consistent policy. This may be reviewed in future.</p> <p>The SPD will be monitored as part of Bedford Borough's annual monitoring.</p> <p>The enforcement of restrictive covenants is not a planning matter.</p>

Number	Organisation	Type	Comment	Response
30			<p>Objects in principle to HMOs as they are not safe re infections including pandemics. The current pandemic may last many years and we need to be prepared for future infections/pandemics. Multiple occupation housing will be at high risk of spreading infections. This will impact local health services and be a high risk in creating localized town shut down affecting the local economy.</p>	<p>There have been no studies in Bedford Borough in relation to the spread of COVID-19 and HMOs. The SPD does, however, seek to provide good quality internal living accommodation and external amenity space considerations. No changes required.</p>

Number	Organisation	Type	Comment	Response
31	Wilshamstead Parish Council	Parish Council	<p>The Parish Council agree with the principles expressed in the consultation document and it is important to have such a supplementary planning document (SPD) to have consistency in the submission and determination of applications. The Parish Object to the area covered and believe it should include the Key Service Centres/ Wixam's. Note that there are unlikely to be many applications, but impacts are the same. Parish Council believe there should be additional guidance on Bedroom Size. Encouragement for pre-application discussions should be set out at the beginning of the document. Propose that there should be guidance on maximum number of occupants per bedroom and a space per occupant for communal areas. Support no on-street parking within CPZ but feel that this may push parking outside the area. Support larger bin stores for HMOs- request that areas should not include footway/pavement as these cause problems for people with restricted mobility. In respect of outdoor amenity space this should exclude drying space. In the event of insufficient space for parking/amenity a reduction in bedrooms should be suggested rather than why applicant may be given an exception. Council do not support front gardens being used for parking.</p>	<p>The SPD applies across the whole of the Borough. However, for areas outside the proposed boundary of the Article 4 direction which removes permitted development rights for the conversion from a dwelling to a small house in multiple occupation no planning permission is required. The Council will monitor the impact of the Article 4 direction and will consider extensions based on evidence of impacts. However, at present there is not enough robust evidence that in these areas there is harm arising from HMOs.</p> <p>In respect of Bedroom Size, there are minimum sizes required for licencing. The SPD uses this figure and supports the use of the national minimum space standards. The total number of occupants is controlled through the licensing regime as it is not possible to enforce the number of tenants through the planning process. Matters re: bin storage and outdoor space are noted. The SPD does cover these aspects, but the supporting text could be strengthened. Pre-application discussions will be encouraged through additions in the introductory chapters.</p>

Number	Organisation	Type	Comment	Response
32	Bedford Borough Council	Ward Councillor	States that the current HMO process isn't fit for purpose in that a property can be populated as an HMO before a Licence is given and that there is no formal consultation process with neighbours. Notes in respect of HMO concentration that there should be a presumption against any further HMOs on the Abbey Field Estates, a standard consultation process that involves neighbours and consultation with estate agents that ensures property documentation includes the need to ask for an HMO Licence process before the property is populated.	<p>The SPD provides guidance on the planning considerations for HMOs and does not deal with the licensing regime. The SPD contains a policy to ensure that the concentration of HMOs does not reach a level where there is planning harm whilst recognising that HMOs provide an important source of affordable accommodation. There is no evidence to justify a presumption against any further HMOs on the Abbeyfields estates.</p> <p>Once the Article 4 direction comes into force, neighbours will be notified of applications to convert a property as part of the standard planning procedures so a consultation process will be introduced. The planning process cannot introduce requirements on estate agents to include specific measures in property documentation.</p>
33		Private Individual	Notes impact of 'illegal' HMO in neighbourhood with adverse impacts on parking and noise. Considered that in an area of homeowners it is unfair to introduce people who do not care about their home or their neighbours. Requests that the neighbours are consulted before allowing a change of occupancy and that they have the power to prevent it if they are not happy!	There is currently no requirement for planning permission to convert a typical (C3 use) dwellinghouse to a small HMO (C4 use) for 6 persons or less. This will change with confirmation of the Article 4 Direction for the Bedford and Kempston areas and the need for planning permission will mean that neighbours within the area are consulted as part of the planning process. No changes required.

Number	Organisation	Type	Comment	Response
34		Private Individual	Lives locally near HMOs. Notes various issues including noise and parking. Requests further consideration of this matter as part of the Council's approach and notes that HMOs exacerbate inadequate parking levels.	The SPD introduces specific considerations for HMO development. This will ensure that conversions consider the number of households within an HMO when calculating the parking requirements. No changes required.
35		Private Individual	I approve of the proposals.	Noted.

Number	Organisation	Type	Comment	Response
36		Private Individual	<p>Response provides several detailed comments. Requests that para 1.1.1. is updated to read: '...landlords or developers - to make applications for development and to aid the Council in making fair, consistent and transparent decisions when determining applications in relation to HMOs to all impacted parties.' to include resident's views. Notes that in 1.2.1 the definition within the link refers to large HMOs and the SPD 'small' HMOs. Questions if the council is changing the size definition of the HMO as part of this activity.</p> <p>1.2.2. Question in respect of definition in respect of difference between care home and HMOs and if care home/ residential institutions require planning permission.</p> <p>2.1.3 Supports principles of SPD but notes there is no provision for consulting with neighbours as part of the assessment and would like this included.</p> <p>3.5.1 highlights that BBC do not currently enforce licensing adequately and there needs to be a more joined up approach.</p> <p>4.3.2 queries the approach between 'sandwiching' and the 100m distance and questions if 'sandwiching' should apply across the streets.</p> <p>4.4.4. external alterations requests consideration be given to high visibility CCTV for HMOs and the relevant community benefits of providing this.</p> <p>4.4.6 Re: Bedroom sizes notes typographical error re: table numbers.</p>	<p>1.1.1. Residents will be consulted as part of the planning process and any material considerations expressed will form part of the decision-making process. The document will help to ensure that consistent decisions are made. No specific change required, although reference to the consultation process will be incorporated into the text for clarity.</p> <p>1.2.1 At present there is no need to seek planning permission to convert a dwelling to a 'small' HMO. BBC is seeking to remove the permitted development rights so that these properties will require permission in future. Changes to the text required to set out difference between 'small' and 'large' HMOs in planning terms.</p> <p>1.2.2 Care Homes/ Residential institutions are not covered by the scope of this document. The conversion of a dwelling (C3) to a residential institution (C2) requires planning permission.</p> <p>2.1.3 As noted residents will be consulted as part of the planning application process. However, licensing operates under a separate regime.</p> <p>3.5.1 Licensing is beyond the scope of the document. The HMO Licensing Team have, however, been consulted as part of the preparation of this document.</p> <p>4.3.2 Sandwiching applies to immediate neighbours only; this will be made clear. This</p>

Number	Organisation	Type	Comment	Response
			<p>4.4.9 in respect of bedroom windows, questions if consideration should be given to obscuring views into the property.</p> <p>4.6 outdoor amenity space and supports the inclusion of leisure space but questions how antisocial behaviour within an HMO can be managed. Supports Parking proposals which are not currently covered. Notes that HMO's are becoming more prevalent just out of town, in larger properties. Such areas might well be considered to have a greater density of vehicles per household, typically 2-3 per 4-bedroom property. Therefore, the impact of 7 additional vehicles (1 per bedroom in a 5 bed 'small HMO' and 2 for visitors), plus the existing resident parking could mean around 22 vehicles, for a 50Mtr frontage with 6 four bed properties, including 1 small HMO). This will cause issues and the existing residents of the area should be consulted as a result. Asks how parking will be enforced.</p> <p>4.10.1 Requests inclusion of information re: responsibility for dealing with rodents. Appendix A requests that the council makes the calculation public. Response includes other more general observations on HMOs in Bedford including issues regarding licensing, how to prevent the challenge of businesses targeting areas to convert properties to HMOs, property values and transparency regarding agreements with other authorities to house individuals in HMOs.</p>	<p>is because issues such as noise/waste are less acute where properties are separated by a street. Some minor text changes will be made to clarify.</p> <p>4.4.6 Typographical error noted and will be changed.</p> <p>4.4.9 Obscured glass may be considered if appropriate, this will be on a case-by-case basis- no change required.</p> <p>4.6 The planning process is unable to manage tenant behaviour. This issue may be dealt with by the Police or the Council's Community Safety Team.</p> <p>Support for specific parking guidance is noted. Other issues are noted but are beyond the scope of this supplementary planning document.</p>

Number	Organisation	Type	Comment	Response
37		Private Individual	Specific complaint against an individual property. Notes there are several HMOs on the Abbeyfield estate and any more would be against the principle mentioned in your document of preventing harmful concentrations of HMOs.	The SPD is not yet in use. However, the guidance does seek to control the over concentration of HMOs within the Borough. No change required.
38	Cycling Campaign for North Bedfordshire	Community Group	Cycling Campaign for North Bedfordshire (CCNB) has looked at the draft SPD on 'Houses in Multiple Occupation' and is satisfied with what has been stated under Section 4.8 on Cycle Parking and Storage	Noted. No changes required.
39		Private Individual	re: bedroom sizes notes that to go below the government's minimum size for the one bedroom, 6.51m ² instead of 7.5m ² is immoral. Notes that it is not uncommon for higher numbers of members of the immigrants or BAME community to be living HMO's and this could be conceived as treating them less favourably than other members of the community. Questions if an equality impact assessment has been carried out.	The National Minimum Space Standards apply to new build properties only and do not include conversions. The minimum size (6.51m ²) is that used by licensing and consistency is needed with the licensing regime. The document makes clear that the Council will encourage room sizes that exceed the minimum standard for licensing and will be assessed in combination with the standards of other facilities available within the property. An Equality Analysis Report will be prepared as a technical paper to support the final report to the Council's Executive recommending adoption of the SPD

Number	Organisation	Type	Comment	Response
40		Private Individual	Response makes specific observations in respect of the Abbeyfields development in Elstow. Questions why there is no requirement for planning permission, but a 5-bed home can be converted without consultation of residents. Notes specific concerns regarding parking, noise, waste and building maintenance. Would like to see additional conversion of office blocks in the centre of Bedford. Notes restrictive covenants in place and questions why they are ignored. Supports greater regulation to control HMOs.	Concerns noted. Permitted development rights currently exist to allow the conversion of residential properties to HMOs. No changes to the document required which provides planning policies to help ensure that the matters raised are considered as part of the planning process.
41		Private Individual	Opposes future HMOs on the Abbey Fields estate as the houses aren't ideal HMO properties, including the limited off-road parking facilities and there are already a number of HMOs on the estate and any more would be against the principle mentioned below of preventing harmful concentrations of HMOs.	Comments noted. A 30% threshold for HMO households within a 100m area is proposed and there is no evidence to justify alternative measures. No change required.

Number	Organisation	Type	Comment	Response
42		Ward Councillor	<p>Specific comment regarding car parking arrangements for HMO's outside CPZ's and Town Centres. Notes that most homes on new or recent developments are allocated 2 car parking spaces per household. In already congested and overcrowded street parking developments, HMO's cannot comply with the recommended 1 car space per bedroom. Recently a four bedroomed house in Great Denham was bought and registered as an HMO. The owner allocated the four bedrooms and turned a downstairs room into a further bedroom. This property had a garage and one parking space. The owner kept the garage for personal use which meant that only one parking space existed for 5 tenants. I don't think the SPD goes far enough regarding locational parking on developments which don't have access to car parks. It should be a matter of restriction that HMO's must provide the correct number of parking spaces. The above example caused and continues to cause tension in the neighbouring area due to inadequate parking provision.</p>	<p>Comment noted. The SPD introduces specific parking requirements for HMOs to help address parking issues across the Borough and is consistent with the Council's existing policies for parking in new developments.</p>
43		Private Individual	<p>Response relates to parking and suggests that where a house has originally been built with two parking spaces or less, to then convert this home into an HMO with multiple occupants that could at times have 5/6 cars leads to massive issues in the area. Especially if there are already existing issues with parking. Consideration should be made that HMOs are not granted in areas where parking issues already persist or indeed in areas</p>	<p>Comment noted. The SPD introduces specific parking requirements for HMOs to help address parking issues across the Borough.</p>

Number	Organisation	Type	Comment	Response
			where the development has not been fully adopted by the council.	
44	Transport for London	Statutory	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the draft SPD	No change required.
45	Elstow Parish Council	Parish Council	The Parish Council feel that the Council need to be mindful of places such as Abbeyfields which are in Elstow, which is a rural village yet within the urban boundary, so therefore, there needs to be a separate policy for how such HMO applications are managed. The Council are acutely aware of the challenges with limited parking for such properties, so feel that there needs to be a better design of such proprieties accounted for within the development plans of new developments in the urban area of Bedford to incorporate a more suitable design for such properties.	There is no justification for specific guidance for Elstow as the SPD will apply to all parts of the borough, both urban and rural. The principles set out the document to assess HMO development are considered enough to address HMO impacts irrespective of their location. The SPD has a range of policies to help manage the impact of parking. No changes required.

Number	Organisation	Type	Comment	Response
46	Renhold Parish Council	Parish Council	The Parish Council feel the document is mindful of the off-road parking and challenges in an urban environment which naturally are the focus of the document. However, the document needs to be clearer in how it manages the classification of such properties in a rural setting, as if you applied the same proposed ratios of the urban environment it could mean a rural parish becomes impacted significantly by such a change of use as the overall setting is fundamentally changed. Therefore, there needs to be a criterion that is specific for the rural area whether this based on percentage of dwellings in the parish, and/or distance between properties given the street scene is very different in a rural village. It is felt that no more than 5% in a rural setting would be a better value than applying a blanket value across the local authority.	The principles set out the document to assess HMO development are considered enough to address HMO impacts irrespective of their location. The SPD has a range of policies to help manage the impact of parking. If robust evidence emerges that demonstrates that the 30% HMO household/surrounding properties is set too high, the Council may consider amending the SPD to address this. No changes proposed.
47		Private Individual	I think HMO's are unhelpful and will cause social problems down the line. They contribute to running down of areas and neighbourhoods and therefore I oppose them and anything which encourages them	Noted. The SPD proposes specific principles against which HMO development will be considered in order to remove harmful impacts. No changes required.

Number	Organisation	Type	Comment	Response
48	Great Denham Parish Council	Parish Council	<p>The Council was pleased to see that Principle 3 – Ensuring Safe Access and Adequate Parking – has been included. Parking is a concern in Great Denham, and the Council has raised this issue in previous consultations. We welcome the proposed guidance on ratios of 1 vehicle space per bedroom plus 0.4 vehicle space for visitors per bedroom.</p> <p>We would also ask that a further condition is included regarding the use of on-street parking (clause 4.9.5) with a clearer statement on limits, for example, a 6 bedroom HMO will require 8.4 vehicle spaces: where this can only be accommodated as on-street parking, the % of available space to be taken up must be considered and a maximum threshold stipulated, e.g. % of total available on-street spaces in that road/street. This is particularly important where there are multiple HMO properties in any street. We also note clause 4.9.7 regarding loss of garden space for on-plot parking; in many new developments garden space is limited and the potential loss of amenity space through HMO on-plot parking is a concern.</p> <p>2. The Council noted the proposals in Principle 1 – Maintaining Balanced, Inclusive and Mixed Communities. We note the proposed limits of no more than 3 HMOS adjacent to each other or sandwiching other houses; we also note that the proposed measure of density is HMOs to be no more than 30% of the density of all properties within 100m radius of the HMO property. The</p>	<p>Noted. The Parking Surveys, which will be required where on-street parking is proposed, will allow the Council to make an informed judgement about the suitability of the parking provision on a case-by-case basis. This is considered a more robust approach which considers local circumstances such as streets where parking is already at a premium. The effectiveness of the approach will be monitored, and the policy may be revised in future, but it is important that the guidance is consistent with the Council's Sustainable Parking SPD. The threshold for HMO limits is applied to a ratio of households, rather than properties. This approach means that the cumulative impact can be monitored where applications are received to extend existing HMOs. The 100m radius will include neighbouring streets for the purposes of calculating density. Given the varying length of streets this is considered to give a better picture of local issues and impacts. The SPD will only apply to new proposals that will require planning permission; we are unable to apply the principles retrospectively.</p>

Number	Organisation	Type	Comment	Response
			<p>density of HMOs in any one street is a concern, when taken in partnership with Principle 3 – Ensuring Safe Access and Adequate Parking. We would ask that the density measure is amended to refer to the entire street rather than 100m radius, given the potential impact on density of on-street parking. 3. Lastly, request confirmation whether it is proposed to apply these new principles not just to new applications, but also to any HMO licence renewals.</p>	
49	Bedford Borough Council	Ward Councillor	I support the proposal, especially the limitation of HMO's to 30% density in each area.	Noted.

Number	Organisation	Type	Comment	Response
50		Private Individual	Response from resident of Abbeyfields area. Notes that HMOs are necessary within a balanced economy, but considers it is important that key workers have cost effective accommodation and notes that newly qualified staff e.g. teachers, nurses are unable to afford other types of accommodation. Also has concerns for other low-paid individuals and students and how they can be housed satisfactorily to include all aspects of their occupancy. Highlights that it is easy to follow a NIMBY approach. Considers that a limited renewable licence scheme should be adopted, landlords of HMOs must be made to take full responsibility for the social behaviour of their tenants and enforcement action taken and licenses revoked across all properties should this be breached. Would like to see limits on maximum number of occupants e.g. 4 rooms= 6 persons to allow two double rooms to be occupied. Considers that there are already enough HMOs within Abbeyfields, and re-licensing of HMOs should be on the basis that there are no adverse circumstances and that that there is adequate car parking. Neighbours should be consulted on any new HMOs but balanced to avoid undue NIMBYISM.	The role that HMOs play in providing affordable accommodation is noted. The Council has a range of measures to encourage additional affordable housing as part of its Local Plan. The response raises several points relevant to Licensing which will be passed on to that department. Whilst the SPD will only be able to apply planning standards to new HMOs, some of the matters raised, such as parking, will form part of the overall balance as to whether the property is suitable. No change proposed.
51	Rushden Town Council	Parish Council	No comments	No change required.

Number	Organisation	Type	Comment	Response
52		Private Individual	Notes that issues are not always quantity of HMOs in an area but quality and the inability/unwillingness of the local authority to ensure that the buildings were suitable for their purpose and maintained throughout the licence. This requires resources. Notes that HMOs are necessary, but many are not licensed. Would prefer that these are managed, and the tenants are known so that tenants have a minimum level of quality, rather than spending time wondering how many are in an area. A good quality property with tenants that care for their space would remove some stigma.	Comments noted. The SPD provides guidance for the determination of planning applications, separate to but alongside the licensing regime. The SPD does contain guidance that seeks to provide a better-quality environment for HMO tenants. No change proposed.
53		Private Individual	Opposes future HMOs on the Abbey Fields estate as the houses aren't ideal HMO properties, including the limited off-road parking facilities and there are already a number of HMOs on the estate and any more would be against the principle mentioned below of preventing harmful concentrations of HMOs.	Comments noted. A 30% threshold for HMO households within a 100m area is proposed and there is no evidence to justify alternative measures. No change required.
54		Private Individual	Highlights specific issues in respect to property on Abbeyfields in respect of recreational drug use.	Comments noted. No change required.
55		Private Individual	Opposes future HMOs on the Abbey Fields estate as the houses aren't ideal HMO properties, including the limited off-road parking facilities and there are already a number of HMOs on the estate and any more would be against the principle mentioned below of preventing harmful concentrations of HMOs.	Comments noted. A 30% threshold for HMO households within a 100m area is proposed and there is no evidence to justify alternative measures. No change required.

Number	Organisation	Type	Comment	Response
56		Private Individual	HMOs should be strictly limited and discouraged wherever possible. It is only acceptable where student accommodation is being provided	Comments noted. HMOs provide affordable accommodation for a range of individuals and are an important part of the housing mix in Bedford. No change required.
57		Private Individual	I would like to raise my objections to any further HMOs in abbey fields. Notes issues including anti-social behaviour. I do not want to see any further HMOs in this area.	Comments noted. A 30% threshold for HMO households within a 100m area is proposed and there is no evidence to justify alternative measures. No change required.

Number	Organisation	Type	Comment	Response
58	Platinum Property Partners	landlord	<p>Does not support the introduction of an Article 4 direction but welcomes SPD as a tool to address issues and encourage collaboration between developers and the council.</p> <p>Principle 1: It is proposed that this percentage is calculated based on licensed bedrooms equating to one HMO household. Where most other Councils that seek a concentration-restriction apply this based on % of houses within a street block or specified radius, this form of calculation requires further justification from the Council. Where an HMO of up to 6 persons is considered permitted development in planning terms due to its reflection of a family household, it is unclear as to why the Council has chosen this method given one or two additional tenants arguably does not result in a material impact. Ultimately, this will likely result in the inefficient use of land and subsequent reduction in accommodation offering at a given site as professional developers try to meet these concentration standards. To elaborate, if a property has been operating as an established 6-bedroom HMO the addition of one extra tenant is unlikely to result in a harmful impact to the local character. Upon refusal, the property would persist with its permitted residential use as an HMO (continued HMO use within the locality), yet one less person would benefit from accommodation at the site; thus, it is unclear how a refusal on the basis of concentration would protect local character. In addition to this, should an area exhibit a</p>	<p>Noted. However, without the Article 4 direction family homes can be converted to HMOs without the need for planning permission and therefore the role of the SPD would be limited only to 'Large HMOs'.</p> <p>Within Bedford, there is identifiable planning harm in areas with high concentrations of all HMOs, the Article 4 direction is intended to assist in the proper planning of all HMOs through the development management process.</p> <p>Principle 1: the approach of using households has been adopted by other local planning authorities within the local area including Milton Keynes and is intended to ensure that the cumulative impact of minor changes does not impact overall on the character of an area. It provides the council with an assessment method to manage these impacts. The comments regarding concentration are noted. However, in areas with a high concentration there were identifiable impacts on amenity and the living conditions of residents. It is therefore undesirable to allow similar concentrations to be reached either in other areas or allow additional harm in planning terms in areas where there are high concentrations. The SPD allows for planning judgements to be made and there may be cases where the threshold is exceeded but all other conditions can be satisfied and so the</p>

Number	Organisation	Type	Comment	Response
			<p>considerable existing surplus in HMO concertation than the outlined threshold, this clearly shows that this housing type has become an established part of the local character.</p> <p>Principle 2: The over prescription of layout design and minimum amenity space within planning guidance seems inappropriate, particularly given the push for efficient and creative use of land in line with national sustainable development principles. Additionally, the guidance proposed that rear gardens should be approximately 50sqm unless proximity to open space can be demonstrated. It is unclear as to why front garden space has not been included, or why the figure of 50 sqm has been chosen. Identifying the value of sustainable locations and nearby open spaces is applauded as this indeed acts as a relevant factor.</p> <p>Principle 3: Although it is acknowledged that lower level parking or 'car free' parking may be acceptable in the outlined circumstances, in the current climate it is considered wildly inappropriate that the Council is suggesting 1 vehicle space per bedroom given the current national target of net zero greenhouse gases by 2050. The established guidance of 1 vehicle per bedroom with further additional visitor spaces promotes car-dependency and will contribute negatively to local and wider quality of health, garden space, environments and unsustainable practices. It is strongly advised that the Council drastically reduce this parking expectation be it</p>	<p>balance may fall in favour of approval. This will be on a case-by-case basis.</p> <p>Principle 2: the SPD requires that the minimum spaces for the purposes of licensing are met. In respect of bedrooms, the SPD is clear that these are the sizes the Council would like to be achieved to ensure a high-quality living environment. In respect of open space, the approach allows for a balance between function and amenity. The text in respect of parking/bicycles and bin storage is noted and will be amended to make clear the Council's priorities.</p> <p>Principle 3: Parking is a major concern in areas of Bedford and Kempston. Until such time as the Parking Standards are comprehensively reviewed, it is considered appropriate to include a level commensurate with the characteristics of flatted and other residential development within Bedford. The SPD is clear that if the Sustainable Parking SPD is updated then the standards may change.</p> <p>Principle 4: noted. Local evidence suggests that even for small HMOs levels of waste can be in excess of those of family homes. This will be monitored as part of the SPD.</p>

Number	Organisation	Type	Comment	Response
			<p>on or off-site, encouraging those attracted to HMOs to reconsider their carbon footprint.</p> <p>Principle 4: PPP is in complete agreement that it is important that the location, design and the size of the bin storage is suitable, so as not to impinge on the amenity of HMO occupants or their neighbours and not to detract from the general amenity and character of the area.</p>	

Number	Organisation	Type	Comment	Response
59		Private Individual	Requests that the consultation period be extended due to absence of printed press/libraries. Overall is in support of the direction of the SPD. Re: Principle 1 would like to ensure that the nature of the local area is taken into consideration e.g. property types as applied and notes that this will have an impact where there are large numbers of properties converted to flats and notes that these will have to take more. Suggests either a reduction from 30% or a calculation based on properties. For principle 2 would like to ensure open space is not compromised by storage. Notes that the CPZ will not prevent overnight parking.	To consider the impacts of Covid-19, the Consultation Period was extended from the normal 4 weeks up to 8 weeks and considerable effort was made to highlight the consultation through the press and social media. The number of responses indicates that the consultation approach has been successful and has generated a range of views and it is not considered necessary to extend the consultation period further. The approach of using households to calculate impact is considered to be more refined than applying a straightforward calculation of HMO properties as a percentage of total as it allows for consideration of the impact of different sizes of HMOs e.g. Large/ Small. The impact on areas with high numbers of conversions has been considered and on balance it was concluded that there was greater benefit in (a) applying a standard concentration to avoid confusion for those making/commenting on applications and (b) controlling the cumulative impacts of extensions to small HMOs across the whole of the Borough. Comments on Principle 2 and Parking are noted. No changes required.

Number	Organisation	Type	Comment	Response
60		Private Individual	<p>Note that it is very difficult to control HMOs but welcomes attempts. Notes there are a disproportionate number of HMOs in the town which is to the detriment of all residents including tenants. Does not consider HMOs should be used as a vehicle by government to solve housing problems, it is a cheap solution to a bigger problem and is being left to private property owners to solve a state problem often at the cost of the poorest in society. It is a short-term issue to a much wider issue and once again planning is left to sort this out. Agrees that the SPD document would be of greater assistance if the PD rights were removed by Article 4 but the criteria for assessment is limited by the adopted policies in place. Highlights a direct correlation between HMO's and the provision of small-scale care facilities in the Poets area and the issues this has on community cohesion and local services, particularly GPs/Health. Considers the concentration of HMO properties has a fundamental negative impact on the established residential character of an area and unfortunately can result in a negative impact on the amenity of surrounding occupiers. Would like to see section within the SPD explaining the need for HMOs in Bedford as seems that Bedford has a disproportionate amount of HMO's compared to other market towns of this size. Notes need generated by other authorities where land values are greater (London authorities) using the lower prices in Bedford to accommodate those on the</p>	<p>The justification for the need of HMOs is set out within the Council's housing evidence base (Strategic Housing Market Assessment). The purpose of an SPD is to amplify existing policies. It is therefore not considered appropriate to include this detailed justification within the SPD.</p> <p>MHCLG have updated the requirements for how housing completions should be recorded within the 'Housing Flow Reconciliation' monitoring return. This means new Houses in Multiple Occupation (HMOs) can be counted towards each year's dwelling completion figures, but only where they have been created from a non-residential use (e.g. the conversion of an employment or commercial building to an HMO). Where a HMO is created through the change of use of an existing dwelling this is recorded as having no overall loss or gain in the housing supply, as such developments will involve the loss of one type of dwelling and its replacement with a different type of dwelling.</p> <p>CIL is not payable on conversions which do not include the creation of new floorspace.</p>

Number	Organisation	Type	Comment	Response
			<p>housing list in their own authorities. Questions if there genuinely a need for this type of housing generated within the borough or is the need coming from other authorities. Questions if the individual units within an HMO are counted as a dwelling for the purposes of the council's 5-year housing land supply. Considers that the assessment for minimum space standards could be subject to challenge and undermined. Also notes that the SPD does not cover the requirement for CIL and asks if the council could request CIL for new households.</p>	

Number	Organisation	Type	Comment	Response
61		Private Individual	<p>Welcomes SPD. Following detailed comments: 1.1.2 add to the text that it is difficult to create a sense of community cohesion in an area with an over concentration of HMOs.</p> <p>Principle 1: reduce 30% relative to 100m radius to 20%. 4.9.2 Fully support this point and add that it is well known that paving over gardens causes water run off issues.</p> <p>I also fully support all points covered in 4.10 and 4.11. The policy document needs to be one part of an overall mixed housing plan. Raises particular concern about 'Section 257 HMOs'. I see these being an exception to the policies laid out in this document as the way forward for the more unscrupulous landlords in our midst. Additional comments regarding licensing enforcement and the identification of unregistered HMOs and asks about restructuring of council team to work together more readily.</p>	<p>1.1.2- this suggestion is supported as there is enough evidence from the preparation of the impact study and from this consultation process that this is a view held by communities where there are high concentrations of HMOs.</p> <p>Principle 1: the 30% threshold has been determined based on the evidence of harm prepared to support the making of an article 4 direction. There would not be enough justification to reduce this further. S257 HMOs are only HMOs due to poor conversion and the relevant HMO licences do not consider the number of occupants or households. Essentially, they are just the same as purpose-built blocks of flats in that sense. They do not bring about the same issues as traditional HMOs. Comments regarding Licensing issues will be passed to that team.</p>

Number	Organisation	Type	Comment	Response
62		Ward Councillor	<p>Welcome the concept overall of the SPD and the introduction of the Article 4 directive. Notes HMOs are an important part of the housing mix for young people, those on low incomes and migrant workers. However, notes that while a low density of HMOs is not usually problematic, an area with a cluster can become a saturation which is to the detriment of families in the area. As detailed in the document the associated problems of short-term occupants and increasing overcrowding bring negative issues such as excess rubbish, fly tipping, poor recycling rates, noise, parking congestion and ASB. In contrast a genuine housing mix in all areas of the Borough makes for a healthier, more balanced community and that should include affordable accommodation for single people to family homes which are actually occupied by families likely to stay in the area and 'invest' in the area in all respects. Notes following specific matters:</p> <p>Principle 1: aspect (b) is not stringent enough - two HMOs next to each other and another directly opposite would not trigger this. Therefore, preferable would be that rather than 'adjacent', "no more than three HMO properties within a 40m radius", while retaining the sandwiching element. In terms of aspect (a), the inclusion of non-domestic properties will still mean there are areas with virtually all residential properties being HMOs. And so suggested rewording: "They will not result in the total number of HMO households exceeding 30%</p>	<p>Comments and support noted. Regarding Principle 1 (b) the impact report did not find specific evidence that HMO properties opposite each other caused specific planning harm (e.g. in respect of noise) and such a measure would be difficult to justify given the intervening presence of a road diluting any impacts. It is proposed that the policy remains unchanged and is monitored.</p> <p>About aspect (a) this is acknowledged as a potential impact though would largely relate to existing areas where that situation has occurred, and the SPD cannot act retrospectively. In such situations, any further applications for HMO development would certainly breach the 30% limit and so would not be supported. With regard to focussing on residential properties only, there would be great difficulty in sifting the available data to differentiate between properties in residential or other use and any results and subsequent decisions would therefore be highly vulnerable to challenge. Principle 3 - It would not be possible to seek cycle spaces against the number of beds as these can change following grant of planning permission and a planning application will only normally consider number of bedrooms. The requirements for cycling must align with the Sustainable Parking SPD standards and the representation would</p>

Number	Organisation	Type	Comment	Response
			<p>relative to the total number of residential properties within a 100m radius of the application property". Principle 3: it is important the cycle parking is not limited to one space for a single conventional two-wheeled cycle for each bedroom and 0.5 short stay spaces per bedroom. The ratio should be based around bed spaces rather than bedrooms. In addition, a proportion of spaces should be suitable for hand cycles/tricycles/trailers and other non-standard cycle equipment. Vertical bike storage should not normally be acceptable, but should be the exception, since vertical storage is not very user friendly and may be off putting. It makes cycle use appear an afterthought, rather than an essential. Car parking arrangements should normally include measures to physically prevent on-pavement and on-verge parking in the immediate vicinity including bollards in keeping with council standards. The loss of gardens and front walls for on-plot parking is not acceptable, reducing green amenity space and degrading the area.</p> <p>Under principle 4 (and section 4.4.2) to avoid harmful effects on the local area, HMO proposals should always be required to provide waste storage in a way that bins are not visible from the street or from other properties if they are at the front of the property.</p>	<p>seek considerably more than that document. However, the requirements may be updated in accordance with a review of parking standards.</p> <p>Car Parking: measures to avoid the loss of garden walls is part of Principle 4. However, it is agreed that this would be useful to cover all areas and not just conservation areas. It should, however, be noted that front walls can often be removed under permitted development rights so this measure may be difficult to control.</p> <p>Measures requiring bollards or other barriers to prevent footway or verge parking would not normally be considered reasonable to impose as the implication would be that it was only the proposed development that would cause issues. If that were the case, and on-site parking could not be provided, then the planning application itself would not normally be supported by officers. Furthermore, verge and footway parking may also be dealt with by the Highways Authority or Police if there is a breach of their legislation.</p>

Number	Organisation	Type	Comment	Response
63		Private Individual	Representation highlights issues with a specific property and the representor has been advised to submit an enforcement complaint. Supports Article 4 direction. Additional general observations include negative impact on houses prices, and inappropriate parking.	Comments noted. No change required.
64		Private Individual	Supports the four core principles set out in the consultation document. The need to consult neighbours so that they may submit their comments on an application to convert, use or develop a property as an HMO before occupation by the owner. Ease of safe access and adequate parking must be ensured. Moreover, the process should also contain means to safeguard the rights of neighbours in cases where a property is populated as an HMO after the owner has taken up occupancy.	Comments noted. It is not clear what is meant by safeguarding the rights of neighbours but that would normally relate to a civil matter which is beyond the reach of the planning process. No change required.
65		Private Individual	Response raises several issues with HMOs including waste, pests, noise and parking within the street.	Comments noted. No change required.

Number	Organisation	Type	Comment	Response
66	Bedford Borough Council	Ward Councillor	<p>I strongly support the concept of the Supplementary Planning Document (SPD) for Houses in Multiple Occupation and the introduction of an Article 4 Direction. I have lived in such houses and moved into a very poorly maintained former HMO as my first house purchase. Long-term residents in this stretch of my street have welcomed the reduction in the number of HMOs. It is clear to me from this personal experience that while a low density of HMOs is often not a problem (there is still one opposite), an area with a cluster can be. I support there being a housing mix in all areas, without any enclaves that have no social housing and where all areas have both entry-level properties (whether small flats or HMOs) and larger family homes used by families.</p> <p>In my view, principle 1: aspect (b) is not stringent enough - two HMOs next to each other and another directly opposite would not trigger (this was the situation where I now live before we bought the house). Rather than 'adjacent', I would favour "no more than three HMO properties within a 40m radius", while retaining the sandwiching element. In terms of aspect (a), I am concerned at the inclusion of non-domestic properties will still mean there are areas with virtually all residential properties being HMOs. I would thus argue that a) should be reworded "They will not result in the total number of HMO households exceeding 30% relative to the total</p>	<p>Support noted. The study, which provides some of the evidence for making the Article 4 supports the observation that a low density of HMOs is unlikely to cause 'planning harm'.</p> <p>Regarding Principle 1 (b) the impact report did not find specific evidence that HMO properties opposite each other or three within a 40m radius would cause specific planning harm (e.g. in respect of noise, waste etc) and such a measure may be difficult to justify given the intervening presence of a road diluting any impacts. It is proposed that the policy remains unchanged and is monitored.</p> <p>Regarding situations where almost all residential properties may be in HMO use, it is acknowledged that this may be the case in certain pockets of the town, but the SPD cannot act retrospectively. Furthermore, in such situations, any further applications for HMO development would certainly breach the 30% limit so would not be supported.</p> <p>Principle 3 - It would not be possible to seek cycle spaces against the number of beds as these can change following grant of planning permission and a planning application will only normally consider number of bedrooms. The requirements for cycling</p>

Number	Organisation	Type	Comment	Response
			<p>number of residential properties within a 100m radius of the application property, unless it is the only residential property within that radius". Considerations including casework have shown me that there is a problem with principle 3: it is important the cycle parking is not limited to one space for a single conventional two-wheeled cycle for each bedroom and 0.5 short stay spaces per bedroom. The ratio should be based around bed spaces rather than bedrooms (since it is utterly unreasonable to expect that a couple will not require the ability to use a cycle at the same time as each other). In addition, a proportion of spaces should be suitable for hand cycles/tricycles/trailers and other non-standard cycle equipment. Vertical bike storage should NOT normally be acceptable, since vertical storage is difficult to use and inconvenient in the same way as steps, steep slopes and narrow accesses. Car parking arrangement should normally include measures to physically prevent on-pavement and on-verge parking in the immediate vicinity including bollards in keeping with council standards and others in the area. Within Castle Ward there are locations where on-pavement parking associated with entry-level properties are causing problems. With ever increasing numbers of conversions to HMOs and flats within the CPZ and without onsite parking to meet demand, the pressure tends towards people parking on pavements and verges. At the same time, I oppose all loss of gardens and front</p>	<p>must align with the Sustainable Parking SPD standards and the representation would seek considerably more than that document. However, the requirements may be updated in accordance with a review of parking standards.</p> <p>Measures requiring bollards or other barriers to prevent footway or verge parking would not normally be considered reasonable to impose as the implication would be that it was only the proposed development that would cause issues. If that were the case, and on-site parking could not be provided, then the planning application itself would not normally be supported by officers. Furthermore, verge and footway parking may also be dealt with by the Highways Authority or Police if there is a breach of their powers.</p> <p>The matter re: waste is noted but the SPD already contains provisions in Principle 4 requiring that storage is well-designed and appropriate for the street scene. No change is therefore considered necessary.</p> <p>Measures to avoid the loss of garden walls is part of Principle 4. However, it is agreed that this would be useful to cover all areas and not just conservation areas so this change will be made. It should, however, be noted</p>

Number	Organisation	Type	Comment	Response
			<p>walls for on-plot parking. Under principle 4 (and section 4.4.2) to avoid harmful effects on the local area, HMO proposals should always be required to provide waste storage in a way that bins are not visible from the street or from other properties if they are at the front of the property.</p>	<p>that front walls can often be removed under permitted development rights so this measure may be difficult to control.</p>

Number	Organisation	Type	Comment	Response
67		Private Individual	<p>Notes that within Chaucer Road there is a vibrant mix of all sizes of family, institutional and HMO property which reflects the social profile, race, gender and diversity of our wonderful town. States that community events are well supported, and the Covid-19 lockdown has highlighted the community spirit across the area with clap for carers, VE Day celebrations and give-away garage sales indicating the strength of mutual support in the residents. We have a very active Neighbourhood Watch and Poets Facebook Group. The community self-organise street parties, Trick or Treat runs and an annual street jumble trail. All this further indicates that the community is strong and keen to maintain Poets as a good place to live for all parts of the community. However, notes that the residential mix is a very delicate balance that must be carefully maintained with the support of the Borough's planning officers. Cites inappropriate conversion has taken place over the years and the street scene has been significantly affected by ugly changes to architecture and some badly maintained properties. Specific concerns re: the future of the now closed Abbeyfield home in Chaucer Rd. This property is now empty, and we are concerned that its future use is appropriate and does not tip the balance of the residential mix of the area. Highlights issues with residential institutions e.g. supported living for cognitively disabled people as well as vulnerable young women and a Bail hostel. Supports measures to</p>	<p>Comments and observations re: community noted and welcomed. Residential Institutions are a different use class to HMOs and will often require planning permission (though there some types of care that may not require it). It is acknowledged that there is a cumulative impact on an area's character where there are high numbers of HMOs and the SPD seeks to control such development to prevent harmful impacts.</p>

Number	Organisation	Type	Comment	Response
			restrict conversions of more family homes that may 'tip the balance'.	

Number	Organisation	Type	Comment	Response
68		Private Individual	<p>Requests a reduction in the percentage from 30% to 20% and an increase the distance from 100m to 150m. Having too many HMOs in an area really changes the character of the area and can in some circumstances be a deterrent for family houses which are equally a big part of a mixed community. A large population of HMOs in an area does not create a fair balance of living arrangements. Your guidance also suggests that no more than 2 dwellings be placed next to each other. Highlights that owners purchase 2 homes next to each other and then run them as one larger HMO. Notes issues with parking.</p> <p>Properties were not set up for multiple homes in one house and so there is usually not adequate parking for these additional cars. Notes issues with out of hours parking (e.g. when CPZ restrictions are not in force). Notes example of Chaucer Road where daytime parking isn't an issue, it's in the evenings where it is full. In some properties back gardens have been removed and turned into car parks changing the environment. Others have front gardens converted where some of the HMOs where have turned front gardens into parking with no dropped kerb access, so I presume no permission to do so and this is not monitored or controlled. Areas such as Chaucer Road have several houses converted by housing associations and flats of various sizes. Whilst these do not count as HMOs, they do account to a large percentage of the street and these types of homes should also be taken into account when</p>	<p>The percentages and distance have been determined based on the evidence. The effectiveness of the policy will be monitored and may be reviewed in future, including if necessary, the need to also consider conversions to flatted development and other residential institutions. The issues with the CPZ are noted and sit outside of the scope of the SPD. The SPD contains measures to control the loss of back and front gardens for parking.</p>

Number	Organisation	Type	Comment	Response
			<p>deciding where to put a HMO to ensure that it is an evenly mixed community of complete houses and shared/split houses. Areas like Poets in Haripur, and others in the borough such as parts of Castle are already very densely populated by HMOs. I would like to propose that you also consider designating parts of the borough where no more HMO applications will be accepted as it already exceeds the density described in your recommendations. It is also very concerning that there are already plans to increase the number of HMOs in Harpur ward without any known planning applications (known to the public) - it seems the decision by Bedford Borough has already been made! As a resident I find this unacceptable. There needs to be a balance across the whole of Bedford Borough, not just populating certain urban wards with a vast number of HMOs.</p>	

Appendix D: Summary of Changes made to the document and reasons

Page	Paragraph (consultation version)	New Paragraph	Change	Reason
4	1.1.1	1.1.1	Minor text changes to: (a) Set out role of SPD for residents (b) Update to reflect current status as adoption draft	To clarify role of SPD for members of the public and local residents in response to consultation comments.
4	1.1.2	1.1.2	Minor text changes and note difficulty in creating sense of community cohesion when large concentrations of HMOs occur.	Improve readability and respond to consultation comments.
4	1.1.3/1.1.4	-	Update document to SPD and HMO	Improve clarity
5	1.1.5	-	Minor text change	To clarify purpose of the SPD as it applies outside the Article 4 area
5	N/A	1.1.6	Include reference to pre-application discussions in opening section.	Responds to consultation comments to improve clarity and encourage early engagement with the council.
5	1.2.1/1.2.2	-	Text changes to make specific reference to use classes order and Housing Act definitions of HMO.	To provide clarity on the definition of HMOs.
5	1.2.1	-	Inclusion of new text to provide clarification on 'large and small' HMOs as they are referred to within the document.	Provide additional clarity as highlighted within the public responses to the consultation and confusion in respect of 'large' and 'small' HMOs
5	1.2.3	-	Include reference to purpose of SPD for communities.	To clarify role of SPD for members of the public and residents in response to consultation comments.
6	2.1.3	-	Make clear that there are relevant policies within the Local Plan for the SPD to hang from and that it is expanding on the policy framework, rather than introducing new policy expectations.	Address comments made through consultation.

9	3.2.1		Text changes to make clear what details the use classes order and GPDO provide.	To provide clarity.
10	3.3.1	-	Delete sub-text re: Article 4 direction	Factual update
10	3.3.1		Signpost to section 3.4 (Permission) and include footnote definition for small/large HMO. Add following sentence 'By contrast, HMOs for the use of more than 6 persons (a 'large HMO') is a Sui Generis Use and planning permission for such use is always required across the whole of the Borough including the rural area.'	Improve clarity in response to consultation comments
11	3.4		Update table to cross reference Art 4 map and include the words 'planning permission' to distinguish from licensing	Factual change. Improvement to clarity in response to consultation comments.
11	3.5.1	-	Update text to clarify the process for licensing and planning permission	Factual change. Improves clarity regarding the process and highlights the procedure for gaining a 'conditional licence' e.g. so that the property is able to operate if/when planning permission is granted.
11	3.5.1	3.5.2	Removal of 'in addition'	Text change for clarity re: additional licences.
13	4	-	Minor text changes	Improves clarity/readability re: scope of SPD
13	4.1.1	-	Include the term 'physical and mental' before health	Respond to consultation comments highlighting impacts of housing on health and improving clarity.
14	Principle 1		Insert footnote to clarify that 'properties' will be measured by the number of recorded address points within an area.	Improve clarity and take into account the recorded data which will be available and assist transparency in decision-making.
14	4.14		Add "areas either through new development or cumulative changes"	Change made in response to

			to recognise justification for measuring household/bedroom spaces	consultation comments regarding justification and requirement to use bedrooms rather than houses/properties within Principle 1.
15	4.2.2		Insert clarification that properties will be measured by recorded address points.	For clarity
15	4.2.4		Remove 'HMO' to allow any part of any property within the area to be counted	Respond to consultation comment to ensure transparency and fairness between HMO/non-HMO properties.
15	4.2.5		Minor change to clarify that the calculation used for determination will be discussed at pre-application stage	Respond to consultation comments re: fairness & transparency.
15	4.2.6		Remove words 'to assist making a successful application'	To avoid any perception that all applications will be successful irrespective of the outcome of the calculation.
16	4.3.1		Add text to confirm that amenity complaints are more acute in physically adjoining properties.	Respond to consultation comments.
17	4.3.7		Change text to read: "Planning and Licensing are two separate regimes; both may be required for the property to operate legally as a HMO"	Responds to consultation comments and makes the point more positively.
18	4.4.1		Minor text changes.	Improve clarity and correct grammatical errors
19	4.4.3		Add: "including accommodation that may be suited to prospective tenants with physical disabilities"	Responds to consultation response raising the lack of suitable shared accommodation within Bedford for those with physical disabilities.

19	4.4.3		Change from “living areas” to “throughout property”	Some consultation responses noted the current impact of COVID-19 and the importance of ventilation. This change means that natural ventilation would also need to be considered in hallways/bathrooms.
19	4.4.4		Add in example re: new window openings to highlight privacy	Responds to consultation comments re: tenant privacy
19	4.4.5		Add “and the number of prospective tenants should be appropriate for the living space provided”	Add clarity to intention e.g. that size of property will influence the number of tenants
19	4.4.5		Amend to read “new bedrooms”	Improves clarity as extensions to properties may include additional communal space.
19	4.4.6	NEW	Add paragraph break to split purpose of space standards from preceding text re: size of property.	Improves readability.
20	4.4.6	NEW	Add emphasis to ‘indicative’	Clarity regarding reason for inclusion responding to consultation comment that they add confusion and could be challenged.
20	4.4.7	NEW	Add new text to clarify role of including licensing standards. <i>“these are minimum standards that must be met to gain a licence for the property to operate. Planning permission for a HMO will not be granted for bedrooms that do not meet the licensing standards. For example, if an application is received proposing conversion to a 4-bed HMO and one of the proposed bedrooms does not meet the minimum licensing standards, permission is not likely to be granted.”</i>	Clarity regarding reason for inclusion, together with additional justification, responding to consultation comment that they add confusion and could be challenged. Also assists applicants in understanding likelihood of receiving permission for intended use.

20	TABLE 6		Remove “no communal facilities”	The SPD encourages the provision of communal facilities throughout. One respondent noted that the inclusion of the different standards could lead to additional confusion. The standards for no communal facilities remains part of the licensing regime but is not encouraged through planning. An additional paragraph containing the standard has been added.
21	4.4.9	-	Add new text: <i>“Meeting, or exceeding, the national minimum standards is encouraged. However, permission will not be refused on the grounds that they have not been met, where the proposal is otherwise consistent with the principles of this SPD.”</i>	Responds to consultation comment and clarifies position re: national minimum standards at the current time in respect of granting planning permission. Note: should the review of the Local Plan adopt minimum standards these could become required as part. The SPD would need to be updated to reflect this.
21	4.4.11	NEW	Sets out standards where no communal living space is provided.	Added for clarity, particularly where there may be a mix of room/unit types.
21	Table 7	NEW	Sets out standards for bedsits (e.g. with kitchens)	Responds to consultation comments re: confusion. The table is taken from the Bedford Guide to HMO (as referenced elsewhere) and does not introduce new

				requirements, but adds clarity re: self-contained units and will assist officers determining applications and applicants to ensure that proposals comply with the correct space requirements to meet minimum licencing.
21 22	4.4.12, 4.4.13		Minor grammatical changes.	For clarity.
23	4.5.5		Add “and meet any licencing requirements” to clarify position on kitchen facilities in bedsits.	Change made for clarity to improve consistency with rest of section on space standards.
23	4.6.1	-	Re-word paragraph. “It is important for residents to have access to private or, semi-private outdoor space. The Council’s priority will be to ensure that properties have access to private amenity space. However, it is recognised that in some cases, some space may be repurposed in order to ensure that the other principles of this SPD can be met in a more effective way, for example storage for bicycles or waste.”	Principles remain consistent but addresses consultation comments re: parking and the loss of garden space. The change aligns statement with Principle 4 which resists the loss of gardens for parking.
23	4.6.2		Change ‘rear gardens’ to ‘private amenity space’.	To reflect the fact that private amenity space may not always be at the rear.
25	4.6.3		New text to reflect that parking is contentious – ‘Parking is one of the most contentious issues for development’	Acknowledged on the basis of overwhelming number of comments received on the SPD that cite parking issues.
25	PRINCIPLE 3		Adds word ‘minimum’ to cycle parking requirements.	Consultation comments raised that standards should apply to bed spaces e.g. number

				of occupants. While it is not possible to impose requirements against a specific number of residents because that number may change and it is not possible to determine at point of application, the amendment begins to address this matter whilst keeping the approach consistent with other council guidance and policy.
26	PRINCIPLE 3		Update (b) to read: <i>(b) demonstrated to be located within an otherwise highly accessible location and provision would not result in the unacceptable loss of garden space</i>	Addresses consultation comments. Brings principle into line with other areas of the document to prioritise space over parking and seeks to protect private amenity spaces. Wording adjusted for grammatical accuracy.
26	4.7.1		Add sentence: Wherever possible, access for disabled persons should also be considered to make HMOs accessible to all users.	Addresses consultation comment that no commentary is provided in relation to disabled access.
27	4.9.2		Add text: Do not adversely impact on the design and setting of a property/streetscape <u>e.g. resulting in the loss of a front gardens.</u>	Addresses consultation comments and provides additional detail regarding the interaction between parking and design.
28	4.9.3		Add “of the CPZ” to end of the first sentence	Improve clarity.
29	4.10.1		Add ‘external’ to bin storage.	Improve clarity.
30	4.10.6		Amend paragraph to read: In many cases, <u>storage to the front of the property will not be suitable</u> and storage to the rear or side of properties will be more appropriate	Addresses consultee comments and provides additional clarification re: design of bin storage

			<p><u>to avoid it impacting negatively on the street scene</u>. In these cases, as with storage to the front, <u>storage should be carefully designed</u>, the proposed area should not be located adjacent to an occupied room and there should be a clear, level route for bins to be taken to the street for collection. Ground covering, such as shingle, should be avoided due to the challenges this presents for safely moving wheelie bins. Current standards setting out the maximum allowable distance from bin storage to collection points can be obtained from the Council's website via: https://www.bedford.gov.uk/rubbish-recycling-and-waste/household-bins-and-recycling/for-developers---providing-bins-for-new-builds/</p>	<p>particularly to the side of the building and the maximum permitted distances from collection points.</p>
31	4.10.8		Insert 'external' before 'space'.	For clarity.
32	4.10.12		Insert 'external' before 'areas'.	For clarity.
32	4.11.1	-	Delete footnote 18 (previously 16) and add: <i>Outside of Conservation Areas, or where a building is subject to Listing, many</i>	Addresses comments from Historic England at the SA scoping stage and in response to the comments made to the consultation. Makes clearer scope of permitted development re: windows and other changes
32	4.12	-	Update section title to "Conservation Areas and Listed Buildings"	Change requested by Historic England.
32	4.12.1		Add text as follow: Within Conservation Areas, the distinction between HMO and non-HMO properties is generally less pronounced in part due to the additional protection and guidance provided in these areas <u>to protect heritage assets</u> . However, the cumulative impacts of minor alterations, <u>particularly within conservation areas</u> are leading to visual harm	For further clarity as requested by Historic England.
33	4.12.4	NEW	Proposals that involve the conversion of a Listed Building must ensure that	Adds short paragraph relating to

			<p>the architectural or historic significance of the building is not harmed as a result of conversion. Some properties will not be suitable for conversion where that significance may be harmed, particularly due to the need for internal subdivision that often comes with HMO development. Specialist advice and guidance for proposals involving listed buildings should be sought at the earliest opportunities</p>	<p>listed buildings following comments from Historic England at the SA scoping stage and in response to the comments made to the consultation.</p>
33	4.12.5	4.11.5	<p>Add <i>“For both Listed Buildings and those within Conservation Areas”</i></p>	<p>Required for clarity following additional paragraph 4.12.4</p>

Consultation Statement: Bedford Houses in Multiple Occupation Supplementary Planning Document

Purpose of the statement

The preparation of this document conforms with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out the details of whom the Council consulted in preparation of the draft Bedford Houses in Multiple Occupation Supplementary Planning Document (SPD).

Initial engagement and pre-consultation

The preparation of the SPD has been informed by the findings of previous work undertaken on behalf of the Council to consider the need for making an Article 4 direction to remove the permitted development right that allows a change of use from a dwellinghouse to a small house in multiple occupation. This study was informed by a Consultation Strategy to understand potential and actual issues arising from HMO accommodation in Bedford and how this may be addressed.

Stakeholder analysis was undertaken to assist in developing the Strategy to ensure that different interests would have the opportunity to inform the work and provide a view on the quantitative evidence. This established the following stakeholder groups should be encouraged to engage in the evidence gathering for the Study; community group representatives, higher education establishments, licensed operators of HMOs, lettings agents, Registered Providers elected members and residents of Bedford Town and Kempston Town Wards.

The first phase of engagement took the form of small focus groups to allow more detailed discussion and ensure that the data capture reflected the reality and perceptions of key groups. Three focus groups were scheduled, comprised of the following:

- D. Higher Education Establishments and Registered Social Landlords
- E. Letting Agents and Licensed Operators of HMOs
- F. Community Representatives, Residents Groups and Elected Members

Prospective participants were contacted via letter and email informing them of the date and format. Contacts for Group A were identified through contacts of Bedford Borough Council (RSLs) and discussions with the Higher Education housing officers. Contacts for Group B were drawn from the list of known agents of licensed properties. Group C were identified in partnership with the Council to include residents' associations, other groups (such as faith groups) and Elected members.

The focus groups took place on 24th June 2019 at The Castle Room, The Higgins between 10am and 4.30pm. Focus Group C for the Community Representatives, Residents Groups and Elected Members

was attended by 7 people, the other focus groups had no attendees. This lack of participation from the groups A and B is identified as a limitation to the study.

To engage with residents, a drop-in event was organised for 4th July 2019. This was hosted at Borough Hall between 12 noon and 8pm.

This was advertised via press release, by informing local community groups, using Bedford Borough Council social media and both Bedford Borough and WYG websites. 22 people attended the drop-in event, with 5 feedback forms completed at the event, 2 received via post and 5 received via email.

In addition to questions on the exhibition boards, feedback forms were offered to attendees. These allowed attendees to share their views and raise any specific queries. Feedback forms were also displayed on the webpage for people to download and return via post or to the bespoke email address set up for the project. All feedback forms were requested to be returned by the end of July 2019, allowing four weeks for responses.

This engagement and the findings of the study itself were instructive of the formulation of the SPD.

It should also be noted that the actual scope for the content of the SPD is limited to no more than guidance on the implementation of the Bedford Local Plan 2030 policies 2S, 30, 31, 32 and 33. Further wider pre-draft consultation was not considered desirable due to the need to avoid raising expectation with regard to the potential scope for the content of the document.

Development of the SPD:

The Council engaged internal staff of Bedford Borough Council in developing this SPD. This included officers from Development Management, Transport Policy, Infrastructure and Highways Development Control, Housing and Pollution and Refuse and Recycling. Each of these service areas considered issues that should be addressed within the scope of existing local plan policy in a new SPD.

As a result of the findings of the Article 4 study, and the internal meetings and discussions, a first draft of the document was formulated based around four key themes that had emerged from the focus group and public consultation:

- Concentration of HMOs and the impact on communities;
- Waste storage and disposal;
- Parking; and
- Visual and environmental amenity.

Whilst other issues had been raised, many of these were not appropriate for addressing within an SPD as they either fell outside of the planning system e.g. enforcement of licensing conditions or were not appropriate for an SPD and needed to be addressed through a more specific Development Plan Document or their own SPD e.g. a planned regeneration of the areas around the station.

Principle 1 dealt with the concentration of HMOs. To ensure that this approach could be implemented the following Local Planning Authorities were contacted for informal discussions as they had also made Article 4 directions and introduced policy relating to HMO control:

- Northampton Borough Council
- Milton Keynes Council
- Southampton City Council

These discussions were focussed on how each council counted properties, applied a buffer and measured HMOs.

An internal draft document was subject to an informal internal consultation period during April 2020. The comments received covered the following issues:

- Ensuring adequate/appropriate car and cycle parking standards to align with Council's adopted parking standards SPD
- Appropriate standards for accessibility
- Ensuring clarity around use and expectations of document
- Clarifications of implementation measures within SPD
- Enhancing protection of gardens and visual amenity/character
- Ensuring adequate/appropriate waste and recycling storage standards
- Inclusion of example conditions not considered appropriate
- Revisions to ensure clarity and avoid conflict with other (e.g. licensing) regimes
- Removal of S257 HMOs from Principle 1 calculations as they do not bring about the same issues as traditional HMOs

As a result of the comments received, the document was amended accordingly, and this forms the final draft the subject of this consultation.

Public consultation

The consultation is scheduled to run for a four week period from 9th June to 7th July 2020. The Council's Statement of Community Involvement (2019) makes clear that, to reduce expenditure, as much consultation as possible is carried out electronically. The Council's website will therefore be the primary means of providing information about the SPD and a dedicated webpage will be set up to provide information about the SPD and how people may comment upon the document. Alongside this, we will publicise the document on social media such as Facebook and Twitter. All contacts on the Council's planning policy consultation data will be contacted and all of those groups consulted during preparation of the report into the impact of HMOs will also be notified.

The neighbouring Local Authorities will be advised by email which comprise: Central Bedfordshire Council, Milton Keynes Council, Huntingdonshire District Council, East Northamptonshire Council and Borough Council of Wellingborough.

In accordance with the Council's Statement of Community Involvement, the normal procedure would also involve placing a copy of the document at the Council's Customer Service Centre and all local libraries for those wishing to view hard copies. Currently, however, the Council's libraries are closed and social distancing measures are in place which discourage face-to-face contact. It is likely that such measures will remain in place for some time up to and including the proposed consultation period. As a result, copies will not be made available at those locations in order to discourage contact and minimise risk of infection. Instead, hard copies of the document will be made available by post where there is sufficient justification, such as for elderly persons without internet facilities. It must be recognised that the Council has a limited ability to print and post documents at the current time due to the need to observe distancing measures within Council offices.

While not a requirement of policy or legislation, it is also common for the Council to run an exhibition or workshop to enable people to discuss the consultation document with officers. As a result of the distancing measures discussed above, this is not an option for this consultation. Instead, the Council will offer two dates when staff will be available between the hours of 9am and 8pm to

take telephone calls to discuss the draft SPD. The details of callers will be recorded and they may make a representation over the phone if they wish to do so.

The following documents will be available to view on the Council's website accessed from the Planning Policy pages:

- Draft Bedford HMO SPD;
- Pre-consultation Statement
- Sustainability Appraisal Screening;
- Details of how to respond.

Following conclusion of the consultation, all responses will be collated and any necessary changes considered.