

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:

- A. Higher Education Establishments and Registered Social Landlords
- B. Letting Agents and Licensed Operators of HMOs
- C. 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, a copy will only be made available at the Customer Services Centre viewable by prior appointment in order to discourage contact and minimise risk of infection. 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.

