

STATEMENT OF CONSULTATION

Summary of Representations and Responses

Full details of the representations are available upon request and the details provided in this table should be treated as a summary only.

	Customer details	Summary of content	Recommended response
1	Peter Scott	<p>Support</p> <p>The threshold is welcomed as it would mitigate several current problems in our area relating to parking, litter, landlords extending properties eroding the character of the conservation area and the quality of the local environment.</p>	<p>Noted, no change needed.</p>
2	Michael and Charlotte Fulford	<p>Support with reservations</p> <p>We welcome the proposals to seek to prevent future high density of HMOs and the negative impact this can have on local streets and communities. We welcome the proposed standards to govern the quality of such accommodation for the tenants and the way the accommodation impacts the surrounding area.</p> <p>Asked for all residents in areas with high density HMO accommodation to be made aware of this consultation.</p> <p>The threshold of 25% HMOs within 50m radius is too high and a reduction to 15% is suggested.</p> <p>The document makes no mention of how to address existing areas of high density HMOs within the borough. The areas with existing high densities have nothing to gain from these new proposals, except to remain as they are. To address this, the following suggestions have been made:</p> <ul style="list-style-type: none"> - The Council sets up a Register and Inspection system of HMOs within the Borough and of their owners. - A self financing and inspection system for HMOs which landlords will be required to register with and pay a fee for; the fee should cover the costs of running the register and inspections. - This will enable the Council to have the resources to inspect properties and ensure they meet the standards in the SPD. It would also provide an up to date database of all HMOs in the borough, a reliable picture 	<p>Noted - no change needed</p> <p>Wide public consultation was carried out running from 15th May to 12th September 2013. Full details are provided in the 20th November report to Strategic Environment Planning and Transport Committee. Resources do not allow for individual notification for this SPD to be provided to every household.</p> <p>Paragraph 5.25 to 5.29 of the draft SPD sets out the justification for the proposed threshold. This justification remains valid and no changes to this are proposed.</p> <p>Paras 5.28 states, '<i>The threshold needs to recognise that many streets are already suffering severe impacts and are no longer considered to be balanced and unsustainable, whilst also acknowledging the proximity of the university to the area covered by the HMO Article 4 Direction.</i>'</p>

		<p>of their distribution and ownership.</p> <ul style="list-style-type: none"> - Enforcement powers would back up the register and inspection system with time limits for compliance by landlords whose properties do not meet the required standards. - Existing HMOs will be given a 2-year time limit to comply with the new standards. - The Council must reduce the current density of HMOs in areas above the new threshold % by setting a time-limit on HMO status of current HMOs, via the licensing system and by requiring landlords to re-apply for planning consent once the time has expired. The time limit could be 5 years and where there is an excess of such properties, the Planning Authority will limit the number of new consents given in order that a certain proportion of dwellings are returned to single family occupation thus bringing the proportion of approved HMOs within the new threshold %. This would help restore the balance between HMO properties with short term tenancies and those in longer term residential use, to the benefit of all residents in an area. - Parking - regularly causes problems for all residents where there is insufficient on-street parking. There needs to be a requirement on landlords to include in their tenancy agreement a restriction on the number of cars associated with each property, allowing only as many as can be accommodated within the property boundary, but without damaging the boundary/ property itself. This number needs to be stipulated in the planning consent and enforced by the landlord. - In areas with a high density of HMOs and where there is no Residents Parking Scheme, a consultation with those residents in the same streets is conducted to see whether a scheme can be introduced which addresses non-HMO residents' parking needs whilst addressing over-crowding and pavement parking. - Such a consultation was carried out in Redlands Ward but not in Hamilton Road, Park Ward. - The SPD states that HMO residents would not have a right to Parking Permits so that any scheme would only have to satisfy the needs of residents in other properties. (Such a scheme in Hamilton Road would stop pavement parking, improve safety for pedestrians, reduce aggravation between citizens and improve 	<p>The planning requirements in the SPD will only apply to future applications for HMOs and cannot be applied retrospectively (this applies to time limits to comply with standards, reducing current densities of existing authorised HMOs and any other aspects sought to be applied retrospectively). Given permitted development rights and the different definitions of HMOs across different departments it is incredibly difficult to get entirely up to date and accurate information about HMOs. However, the planning department is working closely with other departments, in particular the HMO team in order to share information wherever possible ensuring that any data protection requirements are not compromised.</p> <p>Where planning permission has already been granted or in cases where planning permission was not required, it is not possible to withdraw that permission or force people to comply with planning requirements that had not previously applied. It is also not possible for the Council to retrospectively apply a time limit for existing planning permissions or for properties that previously did not require planning permission and are currently operating lawfully.</p> <p>The threshold level set in the version of the SPD for adoption seeks to ensure that mixed and sustainable communities within the area covered by the Article 4</p>
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		car access in and out of properties, allow access 24/7 for large and emergency vehicles.)	<p>Direction are secured. Where areas already exceed the threshold level (and therefore could be considered to no longer be mixed and sustainable) the threshold level will help ensure that this impact is not worsened.</p> <p>There is a process of assessing HMOs under the licensing system. Planning Enforcement is covered by separate legislation as are the funding regulations for both systems.</p> <p>Where a planning application is needed parking levels would be assessed against current policy and through consultation with the Transport Strategy team. Where appropriate, conditions are attached to planning permissions granted.</p> <p>Transport Strategy has confirmed that in the first instance they would look for the majority of residents to demonstrate support for any residents parking scheme, for example through a petition. Any consultation and subsequent residents parking scheme would seek to address the needs of all residents.</p>
3	GK Renshaw	<p>Support Support the proposal for 25% HMOs in a 50 metre radius in Park Ward.</p>	Noted, no change needed.
4	Peter Kayes Chair, Redlands and University Neighbourhood Action Group	<p>Support with reservations We welcome much that is proposed and in particular the elements relating to HMOs. However there are some specific proposals which we wish to challenge.</p> <p>Our primary concern relates to the proportion of properties which will</p>	<p>Noted, no change needed.</p> <p>Paragraph 5.25 to 5.29 of the draft SPD sets out the justification for the proposed threshold. This justification remains valid and no</p>

		<p>be permitted to convert to HMOs within specified areas. The use of a 50m radius appears a reasonable approach, however, a percentage as high as 25% before an application is rejected is too high and would prefer to see a figure adopted nearer to the 10% proposed in our earlier submission.</p> <p>A significant number of roads across the NAG area where the proportion of properties already converted to HMOs is in excess of 25% and a number where it exceeds 50% and this concentration is already putting a huge strain on the local communities as well as services and creating undue pressure on roadside parking space. These pressures cause an overspill into neighbouring roads where the proportion of HMOs may be lower.</p> <p>There are areas with a low concentration of HMOs or outside the 50m radius which are already being impacted upon, in terms of parking, noise levels and activity. A lower limit than the 25% is needed to prevent further adverse impact on the community as a whole. A 10% limit for properties seeking to convert would be appropriate given that these properties would be likely to constitute 20% of the residential population. This acknowledges that some roads will be well in excess of the permitted level and whilst no more conversion would be likely to be approved in these roads they already have a disproportionate impact on the wider surrounding area. A lower limit for future approvals will also help to compensate for the existing excess of existing HMOs beyond the 25% limit in these areas.</p> <p>We recognise that a proportion of HMOs are needed to support the local student population as well as others sharing accommodation in HMOs, however, the University has advised there is already a surplus of accommodation as a result of the substantial number of conversions which have taken place over the last couple of years, before the Article 4 Directions came into effect. There is no specific local demand for more properties of this type.</p>	<p>changes to this are proposed.</p> <p>The issues that have been raised have been taken into account in demonstrating the exceptional circumstances for removing permitted development rights to convert from a C3 to a C4 use by means of an Article 4 Direction.</p> <p>Where a planning application is needed parking levels would be assessed against current policy and through consultation with the Transport Strategy team. Where appropriate, conditions are attached to planning permissions granted.</p>
5	Michael Clare Crime Prevention Design Advisor	<p>Additional detail required</p> <p>Second submission of comments:</p> <p>Whilst in support of the above policy, Government have also changed permitted rights so that offices can be converted to dwellings. Whilst this is a good idea it takes away from the council the ability to look at how the change of use may affect how the building functions. Such</p>	<p>Noted, partially agreed. Minor changes proposed.</p> <p>Much of this representation concerns new build residential development, whereas the SPD is concerned with conversions of existing buildings. It is difficult for</p>

		<p>functions that need attention to detail so as to remove a fear of crime or even facilitating crime are:</p> <ol style="list-style-type: none"> 1. Communal entrances which maybe good during the day for office staff with a reception, but for dwellings with no reception / no concierge, with communal entrances tucked around a corner, can affect a feeling of safety for residents. 2. Bins stores in a semi public area, but with no natural surveillance and again tucked away, can also create a fear of crime. 3. Access control via the communal entrances if more than 10 dwellings should incorporate visual as well as audible access control. (This is the Secured by Design standard designed to help counter offenders gaining easy entrance to such developments.) 4. Postal delivery, again needs to be planned. Tradesman's buttons are not allowed on Secured by Design developments, so as to stop offenders gaining access during the day to break into flats. 5. Individual flat entrance doors off a shared corridor, need to be to internal door standard BS Pas 24:2012, so as to stop other residents or offenders gaining entrance to the block and forcing individual entrance doors to burgle the various dwellings. <p>Because of such permitted development rights I note there are a few planning applications for offices to be converted to dwellings / HMO's. Such permitted development without the above attention to detail, could mean that the new use ends up facilitating crime and make the development unsustainable.</p> <p>I would ask that the Council also consider such development on their area and include it within the Draft Residential Conversions SPD or consider an article 4 direction for Reading for such development so council has control as to how such development will function and to be able to help design out crime.</p> <p>First submission of comments: The document makes reference to:</p> <ol style="list-style-type: none"> 1. Crime and safety - mentioned at para 2.5 2. Secure cycle storage - mentioned at para 2.38 and 3. Checklist 16 - Again mentions secure cycle storage - on page 19 4. Housing Act 2004 - Housing Health and Safety Rating Scheme (para 2.52) which has as one of its 29 hazards, 	<p>the Planning system to achieve many of the requirements set out in the consultation response at this stage. Prior approval for offices to residential development does not allow for consultation of crime safety issues.</p> <p>Issues that are pertinent to this SPD are addressed below: The role and importance of design in creating safe and accessible environments is recognised in the Core Strategy policy CS7: Design and the Public Realm.</p> <p>Conditions will be attached to specific applications as appropriate regarding design and designing out crime. To highlight the importance of designing out crime, an informative, as appropriate could also be attached to any permissions granted regarding the security of curtilage buildings and achieving Part 2 of the Secured by Design award. Policy DM4: Safeguarding Amenity, refers to crime and safety. The Crime and Safety element of policy DM4 is relevant to checklist points 2, 5 and 16 in particular. A footnote will be added to checklist point 5 regarding reference to the Secured by Design Award in an informative and a point of clarification regarding crime and safety at paragraph 2.39.</p> <p>There is also a policy about sustainable design and construction in the Core Strategy (Policy CS1) which addresses how reductions in CO2 emissions would be secured, as</p>
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		<p style="text-align: center;">‘Entry by Intruder’.</p> <p>I could not see further reference to crime and safety</p> <p>Because Reading is a University town, the majority of HMO’s are for student accommodation. Home Office research shows that <i>“Students are, statistically, one of the most likely groups to fall victim to crime. Students own more expensive consumer goods per head than the rest of the population. It is no surprise then that 1 in 3 students becomes the victim of a crime each year. Added to that fact, young people (aged 16 to 24 year old) are around three times more likely to be victims of burglary than people in other age groups, which makes students all the more vulnerable.”</i></p> <p>Houses should be capable of being secured to deter against unauthorised entry. Ground floor windows and doors should be robust and fitted with adequate security locks.</p> <p>Externally, the curtilage of the property, including any garden or yard should be properly enclosed. Access to rear gardens should be restricted and be properly gated. Sheds or outbuildings should be maintained in good order and made secure. Security lighting should be fitted to provide illumination adjacent to access points and to illuminate areas that might permit concealment.</p> <p>It therefore follows that such HMO’s should have a commensurate level of physical security to deter and prevent crime so that students or other occupiers have suitable safe accommodation that helps them to study / work and successfully achieve their aims at the University. From police experience of problems of theft and burglary in HMO’s with inadequate security, the imposition of conditions regarding physical security standards could be justified.</p> <p>National sustained research proves that Secured by Design housing developments suffer at least 50% less burglary, 25% less vehicle crime and 25% less criminal damage.</p> <p>Crime is also a generator of CO2 emissions and in England & Wales is estimated to create 12 million tonnes of CO2 emissions - equivalent to 2% of the UK’s total CO2 output. If new development is constructed to part 2 (physical security) of the Secured by Design award, not only will this reduce crime, but also reduce CO2 emissions and make the development more sustainable for its lifetime.</p>	<p>appropriate through planning applications.</p>
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6	Carolyn Jenkins Parks Department RBC	<p>Clarification/ amendments required</p> <p>I have looked through the draft SPD, and have the following comments on both amenity and other open space.</p> <p>2.16 I accept that central Reading developments may not meet the standards set out in 2.15. However, should you qualify your requirement for sitting-out and drying space by requiring that it is space that is not shaded for the entire day every day of the year (it may be shaded all day in winter, but one would expect some direct sunlight during the summer, if the space is to be attractive enough to actually be used).</p> <p>2.37 The Open Spaces Strategy includes the requirement that we would seek, where possible, boundary tree planting for new town centre developments in order to increase tree cover within the town centre. Could this be strengthened, not simply to protect existing green landscaping (as well as boundary walls, etc.) but to require, where possible, enhancements to existing green landscaping on road frontages?</p> <p>2.45 Refer to the draft revised Planning Obligations SPD.</p> <p>3.3 A closing bracket is missing.</p> <p>3.5 Are you saying that private space for a family-sized unit may be provided at the expense of any space at all for non family-sized units? This needs clarification.</p>	<p>Noted, minor changes proposed.</p> <p>Clarification has been added to paragraph 2.16 to state that ideally this open space should benefit from direct sunlight particularly during the summer months.</p> <p>Clarification has been added to paragraph 2.37 to set out that opportunities should be taken to enhance existing green landscaping on road frontages as part of any proposal.</p> <p>The Revised Planning Obligations SPD has now been referred to.</p> <p>The grammar and punctuation errors at paragraph 3.3, 5.17 and 5.22 have been addressed.</p> <p>Checklist point 4 relates to an appropriate level of outdoor amenity space and relates to all conversions. A sentence is proposed to be added to Paragraph 3.5 to</p>

		5.17 'data' is plural: '... Census data indicate ...'; ditto 5.22	clarify that all units should still meet the requirements of policy DM10.
7	Michael Corbett Wokingham Borough Council	<p>Concerns raised</p> <p>The Draft Residential Conversions SPD is broadly in line with Policy CC04: Sustainable Design and Construction, TB05: Housing Mix and TB07: Internal Space Standards of the MDD DPD.</p> <p>The Article 4 Direction is located in the Park Ward (of Reading Borough), which borders the Wokingham Borough parish of Earley and the wards of Bulmershe and Whitegates and Maiden Erlegh.</p> <p>It is noted by Wokingham Borough Council that there is a 50m radius in the Draft SPD for determining the 'tipping point' for house in multiple occupation (HMO) concentration, but that only those properties in Reading Borough will contribute to the assessment as to whether 25% of the nearby properties are already HMO and thus a proposal would push an area over the 'tipping point'.</p> <p>Wokingham Borough Council has concerns about the potential for cross border impacts of this and the potential to result in a proliferation of HMOs in the surrounding areas that are within the Wokingham Borough, as HMO developments may be 'pushed' out of the Article 4 Direction area and into those surrounding.</p> <p>Wokingham Borough Council is concerned about the potential for HMO developments to increase in the adjacent areas to the Article 4 Direction area in the Park ward and would recommend cooperation and coordinated working with Wokingham Borough Council on potential developments in this area as they arise.</p>	<p>Noted, no change needed.</p> <p>Wokingham Borough Council was consulted prior to the Article 4 Direction being made and was also formally consulted when the Direction was made on 16 May 2012 and did not submit comments at either of these stages.</p> <p>Where relevant, in accordance with our internal consultation procedure and to meet statutory consultation requirements, Wokingham Borough will be consulted on applications as they are submitted.</p>
8	Rupert Shute	<p>Support with additional suggestions</p> <p>Support proposed cap on HMOs of 25% in 50 metres.</p> <p>Also propose that an additional ward-cap is introduced e.g. 10%, so:</p> <ol style="list-style-type: none"> 1. Are 10% of the houses in the given ward already HMOs? 2. Within 50 meter radius are more than 25% of houses HMOs? <p>Planning permission would only be granted if the answer to both 1 and 2 is NO.</p>	<p>Noted, no changes needed.</p> <p>Paragraph 5.25 to 5.29 of the draft SPD sets out the justification for the proposed threshold. This justification remains valid and no changes to this are proposed.</p> <p>The Article 4 Direction applies to parts of Redlands, Katesgrove and Park Wards and no ward is fully</p>

			<p>covered by the Article 4 Direction, so this proposal would not tie in with the Article 4 Direction boundaries.</p> <p>Additionally, it would add an additional layer of complexity and be incredibly resource intensive (whole wards would need to be analysed) and it is not clear what/ if any benefit that this approach would be.</p>
9	Cllr Tony Jones Labour Councillor for Redlands Ward	<p>Support</p> <p>I welcome:</p> <ol style="list-style-type: none"> 1. The incorporation of the previous Planning Guidance for flat and HMO conversion into this new document dealing also with the maintenance of a mixed and sustainable community in the Article 4 areas. 2. The criteria set out for the securing of a mixed and sustainable community in the Article 4 Direction areas. I know that many other residents in Redlands will also welcome them. 3. The level of 25% for the 'tipping point' of concentration of HMOs as a reasonable one. 4. The radius of 50m to be used for assessment, given that part properties fall into the assessment, is also reasonable and practical. The exclusions provided for I also consider reasonable. 	Noted, no change needed.
10	Tom Lake	<p>Support</p> <p><i>Officer note: the perceived impacts of HMOs are firstly detailed in this respondent's comments.</i></p> <p>I welcome the incorporation of the previous Planning Guidance for flat and HMO conversion into this new document dealing also with the maintenance of a mixed and sustainable community in the Article 4 areas.</p> <p>The evils of overconcentration of HMOs are well-known, are referenced in the document and have been rehearsed above. I thoroughly welcome</p>	Noted, no change needed.

		<p>the explicit and clear criteria set out for the securing of a mixed and sustainable community in the Article 4 Direction areas. I know that many other residents will also welcome it. It does not provide a halt to conversion, but it does provide for a stop to over-concentration of HMOs which will make a real contribution to our local community. The applicability of the main part of the planning document to HMO conversions will also make a good contribution to the standard and future utility of the housing stock.</p> <p>The level of 25% for the “tipping point” of concentration of HMOs is a reasonable one. Given the greater intensity of accommodation in HMOs compared to their neighbours we can see that this represents a proportion of HMO dwellers around 50% and certainly anything higher would miss the aim. The radius of 50m to be used for assessment, given that part properties fall into the assessment, is also reasonable and practical. The exclusions provided for I also consider reasonable.</p> <p>There has been some concern that in preventing further conversion in the HMO hot-spots areas that are presently entirely unaffected could be subject to HMO conversion. Certainly, the aim is to see any new HMO conversions away from the existing hot-spots. But it is worth nothing, as explained above, that streets like Alexandra Road are subject to a type of HMO conversion different to that in our Victorian terraces and that this distinction is likely to remain and apply generally throughout the Article 4 area.</p> <p>I therefore thoroughly support the proposed new planning document and commend those who have carried through so clearly and effectively the aims of much of the community in the light of real evidence from here and elsewhere. I look forward to seeing it used in practice and hope it might become a standard which others might look to in drawing up their own guidance.</p>	
11	Brian Morley	<p>Support with suggestions</p> <p>I am pleased with the proposal to limit the density of HMOs by the proposed 25% within 50m radius circles. As the density of much of the area is already greater than the proposal (tipping point has already passed) I trust that the proposal will prevent much more change in the area.</p> <p>I have some concerns to be considered in the administration of the plan:</p> <ul style="list-style-type: none"> - I am concerned about the areas where the dense housing of terrace streets backs onto less dense streets and longer back 	<p>Noted, no change needed.</p> <p>Paragraph 5.25 to 5.29 of the draft SPD sets out the justification for the proposed threshold. This justification remains valid and no changes to this are proposed.</p> <p>The issues that have been raised have been taken into account in</p>

		<p>gardens such as Eastern Avenue and Alexandra Road, and that it may lead to greater density in such areas.</p> <ul style="list-style-type: none"> - I am also concerned that changes from family houses to HMOs is still going on rapidly and would like the council to note current applications for planning permission and building regulations approval and advise that acceptance as an HMO is unlikely to be granted. The current projects should also be noted so that they can be checked as HMOs and included in calculations of density. I do not think voters register information and non council tax paying houses is sufficient for the calculation purposes. 	<p>demonstrating the exceptional circumstances for removing permitted development rights to convert from a C3 to a C4 use by means of an Article 4 Direction.</p> <p>As the planning department becomes aware of new HMOs, these will be taken into consideration in future calculations.</p> <p>Paragraphs 5.36 to 5.42 of the draft SPD set out how properties will be identified in terms of whether they are considered to be a HMO.</p> <p>For a number of reasons, as set out in paragraph 5.41, <i>'it will not be possible to guarantee a 100% accurate count in all cases...'</i>. After considerable work investigating appropriate methods to consider whether properties are in an HMO use, environmental health and Council tax information are considered to be some of the most reliable forms of information to contribute to a conclusion as to whether a property is being used as an HMO or not.</p>
12	Richard Towers	<p>Support with reservations</p> <p>My wife and I are greatly encouraged by the Council's recognition that the over concentration of HMOs in Reading has resulted in an unwelcome change in the communities most affected.</p> <p>Several issues need additional attention:</p> <ul style="list-style-type: none"> - Parking. The document goes a long way to addressing this issue but refusal of resident parking permits will only displace vehicles to streets where no permit is required. Where HMOs have small drives it is often the case that the last car home parks on the pavement. I would like to see obstructive parking classified as a breach of the permitted development right for an 	<p>Noted, partially agreed and minor change proposed.</p> <p>Where a planning application is needed parking levels would be assessed against current policy and through consultation with the Transport Strategy team. Where appropriate, conditions are attached to planning permissions granted. If Transport provision is contrary to policy, the position would be assessed as part of the application</p>

		<p>HMO. I do not consider that the proximity of a bus route and local amenities will reduce the need for parking. Young adults want their own cars and the permission for an HMO use should assume one car per bedroom and then be sure that those cars can be accommodated in the street. If they cannot be accommodated then permission should be refused.</p> <ul style="list-style-type: none"> - Bins. Many if not most occupants of HMOs prefer to leave the bins on the pavement rather than remember to put them out every week. Bin accessibility is dealt with, however, as part of permitting HMOs positive action should also ensure that bins are taken in after they are emptied and persistent failure to observe this made a breach of a permitting condition of being an HMO. The landlord would then need to ensure that his/ her tenants complied. - Estate Agents boards. Although this matter is being dealt with elsewhere, would it be possible for an HMO permit to be conditional on no estate agent's board being displayed for lettings? - Paragraph 5.17 should read, '...almost 100% higher in Reading...' It would be wrong to underplay the significance of HMO density in any way in any part of the document. - The threshold proposed in paragraphs 5.27 and 5.29 is not low enough. It is wrong to consider the threshold by reference to the areas which have the highest density. 25% is indeed much lower than the density of 40% in Redlands, but it is very nearly 600% higher than the national average. There should be an attempt to reverse this blight on many areas of Reading by reference at least to the current average of HMO dwellings in the town - i.e. 6.6%. I would really prefer to see a threshold much lower than 25%. - Enforcement. The document recognises that enforcement is difficult and costly. I have direct experience of an HMO next door to me which is occupied and advertised as being a 7 student HMO although the Council states it should be occupied by no more than 6 people. This has been ignored by the landlord and demonstrates that landlords will take advantage of a weak enforcement regime. Therefore in paragraph 5.41 where there is significant doubt as to whether a dwelling is an HMO or no, the presumption should be that it is one and it will count towards the threshold. 	<p>and a view taken as to what the outcome of the application should be. It is not reasonable, nor possible to state categorically in an SPD that an application would be refused if parking standards are not met.</p> <p>Permitted development rights are set by national not local government and are not something that could be altered through this SPD.</p> <p>Where appropriate conditions relating to bin storage could be attached to any permissions granted. Conditions cannot be attached retrospectively to address existing situations though.</p> <p>Licensing of HMOs are dealt with under separate legislation to Estate Agent's boards, which fall under Advertisement Consent regulations and fall outside the scope of this SPD.</p> <p>Paragraph 5.17 has been altered to read '<i>This figure is just over 80% higher...</i>'</p> <p>Paragraph 5.25 to 5.29 of the draft SPD sets out the justification for the proposed threshold. This justification remains valid and no changes to this are proposed.</p> <p>The issues that have been raised have been taken into account in demonstrating the exceptional circumstances for removing permitted development rights to convert from a C3 to a C4 use by</p>
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			<p>means of an Article 4 Direction.</p> <p>The Council's adopted Planning Enforcement Policy is set out on the Councils website at www.reading.gov.uk.</p> <p>The Council must have a reasonable approach in terms of how HMOs are considered and the existing approach as set out at paragraph 5.41 is considered reasonable and therefore no changes are proposed.</p>
13	Martine Naughton	<p>Support broad principles but concern over some elements</p> <p>We live on Hamilton Road and the impact of HMOs on our street is very clear when comparing the north and south of the street.</p> <p>At the Cemetery Junction end of our street, the majority of housing is of HMOs which conflicts with a number of the checklist points on the consultation document and certainly exceeds the 25% density in a 50m radius.</p> <p>Checklist points in conflict are: Checkpoint 1 - Driveways have been concreted over to create minimal parking (but not enough for the number of residents).</p> <p>Checkpoint 13 - Parking is not sufficient on the road for the number of people living in the street and significantly more cars are parked at the end of the street with HMOs as there is not sufficient off-road parking.</p> <p>Checkpoint 17 - Bins of the HMOs are placed close to the pavement and stored in prominent places in front of the houses. There is insufficient capacity in bins for the number of people living per property and so they overflow. On bin day the bins block the pavements even more than the cars.</p> <p>Checkpoint 20 - Enforcement notices. Several properties on Hamilton Road have caused conflict because they have been modified for HMO use but the landlords have carried out the modification work first and contacted the council for 'retrospective planning permission' once they have tenants and thus an income. Tenants can live in the properties for</p>	<p>Noted, partially agreed, minor change proposed</p> <p>The requirements of the SPD will not apply retrospectively, they will however, be taken into consideration in the determination of future planning applications.</p> <p>The restrictions for satellite dishes and television aerials are covered by permitted development rights. Additional wording added to paragraphs 2.3 and 2.6 of the version of the SPD for adoption to confirm that where satellite dishes and television aerials require planning permission, they should be located to respect the character of the property as much as possible, particularly in conservation areas.</p> <p>The Council's adopted Planning Enforcement Policy is set out on the Councils website at www.reading.gov.uk.</p> <p>The resource implications that the SPD raises are considered in the</p>

		<p>months/ years before anything is done about them.</p> <p>Finally there isn't anything relating to satellite dishes, the number of TV aerials on a property, or the location of these transmitters on a property. The end of the street demonstrates many of these conflicting with Conservation Area rules in Park.</p> <p>Our biggest concern is that the Council do not appear to have the money in order to carry out legal action against anyone who does not meet with planning rules and regulation.</p> <p>Without the resources to enforce planning control, how will the council enforce the checkpoints? What can be done about the landlords that submit planning applications, withdraw them when they meet with conflict, only to see them submitted again, delaying any resolution for months or years?</p> <p>In summary, in theory I agree with some sort of density of HMOs and 25% per 50 metres would be a good start (although I would prefer it to be less) but I don't see how the council will be able to enforce any measures whatever ratios are decided upon if, as we were advised they are under resourced financially.</p>	<p>'Risk Assessment' part of the committee report. Re-evaluating the resource implications will not alter the ability of landlords to withdraw applications once submitted.</p> <p>Paragraph 5.25 to 5.29 of the draft SPD sets out the justification for the proposed threshold. This justification remains valid and no changes to this are proposed.</p>
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