

Houses in Multiple Occupation (HMO) Supplementary Planning Document (SPD) Schedule of comments received and officer comments – The consultation ran from 12 September 2025 to 26 October 2025, generating 132 responses from 22 stakeholder comments.

In preparing this SPD all stakeholders listed on the council’s Local Plan Database were consulted. The following respondents provided comments on the SPD.

Response ID	Name	Organisation	Section Question (HMO SPD)	Summary of main points raised	Officer Response	Action Recommended
010001	Charlotte Littlewood	Kingswood Town Council	Whole Document	Support for SPD Update	Noted	No change to HMO SPD.
020001	Nicky Pearson	Member of the Public	Whole Document	Lack of landlord enforcement has led to waste management and garden maintenance issues causing potential health hazards for the local community. Suggestion of a mandatory waste and garden maintenance plan for HMO licences.	Noted The HMO SPD includes clear guidance for landlords of HMO properties about how to apply for additional waste bins, ensure appropriate refuse storage, and avoid harmful impact on residential amenity, in accordance with national and local policy. This is set out in Tables 3 and 7 of the HMO SPD.	No change to HMO SPD.
020002	Nicky Pearson	Member of the Public	Whole Document	Insufficient parking spaces for HMOs (currently 0.5 spaces per bedroom). For new build HMOs a parking assessment should be required by	Noted The Policies, Sites and Places DPD (adopted 2017) at Policy PSP16 (Parking Standards) sets out comprehensive development plan policy requirements for the amount of car and cycle parking spaces required in proposed new development. HMOs can have an increased number of adults	No change to HMO SPD.

				<p>Local Authority to ensure a minimum disruption to local community</p> <p>Suggests 1 parking space per bedroom to enable a new HMO licence for conversions from residential properties.</p>	<p>compared to family homes however there is limited evidence showing every resident will own a car. Increasing the number of car parking spaces per resident would enable higher car ownership rather than relieve the problem of insufficient car parking spaces. A technical advice note which provides guidance on parking standards is available at 3046-Parking-Survey-TAN.pdf</p>	
020003	Nicky Pearson	Member of the Public	Whole Document	<p>Agree with principle of not allowing 'sandwiching' and over concentration of HMOs.</p>	Noted	No change to HMO SPD.
020004	Nicky Pearson	Member of the Public	Whole Document	<p>Current HMO mapping tool is out of date and does not accurately depict HMO concentration - example given of a licence being approved when 10% threshold had already been exceeded. Mapping tool should encapsulate all HMOs whether large or small.</p>	<p>The Council is aware that the data supporting the interactive map South Gloucestershire Map Layers WebMap2511 showing the location of all Licensed HMO's (5 or more people 2 or more households) is currently based on the 2011 Census Output Areas (COAs) which was the information available at the time the Houses in Multiple Occupation Supplementary Planning Document (HMO SPD) was published in October 2021. We are also aware that since this time the 2021 Census data and its supporting COAs have been published. The <i>HMO SPD</i> update will address this in accordance with the procedures for preparing SPD as set out in the Town and Country Planning Regulations 2012. A proportion of small HMOs (occupied by three to six persons) will have been developed through use of</p>	No change to HMO SPD.

					<p>permitted development rights, whereas large HMOs (seven persons or above), or intensification of an existing HMO property that would result in it becoming a large HMO, require planning permission. This is explained in Figure 1 of the HMO SPD.</p> <p>Moreover, it should also be noted that the 3 and 4 people HMO's are much more akin to a normal family house and there will be plenty of rented and owner occupied single family houses with more occupants, especially with the current housing market with extended families living together. This is one of the reasons licensing is required for HMO's with 5 or more occupants and not the smaller ones and therefore why the Council does not record any small (unlicensed) HMOs on the locator map. Furthermore, due to the HMO licensing requirements, where only large HMOs are required to have a mandatory licence, it is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a register of small HMOs, however, small HMOs are required to fully comply with The Housing Act 2004.</p> <p>When the new map goes live any small sites granted planning permission since January 2024 (i.e. since the A4Ds came into effect) will be shown. Small sites (which are not licensed) in operation before 2024 will continue not be shown as explained above.</p>	
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					Planning applications for HMO development have been determined through professional planning judgement and in accordance with adopted local and national planning policy and in some cases may exceed the 10% threshold.	
020005	Nicky Pearson	Member of the Public	Whole Document	Suggestions that properties should be marketed for residential usage for 6 months prior to being allowed to apply for HMO licence.	This issue falls outside the scope of the HMO SPD as HMO licences are managed by Private Sector Housing Team	No change to HMO SPD.
020006	Nicky Pearson	Member of the Public	Whole Document	Landlords should be required to hold a valid HMO licence and hold no history of prior housing and landlord offences		
030001	Andrew Dowling	Member of the Public	Whole Document	Support for HMO SPD to combat Waste issues, lack parking and anti-social behaviour	Noted	No change to HMO SPD.
040001	Edward Walters	Member of the Public	Whole Document	Unhappy that HMO SPD consultation was not on the Council's consultation website	Details of the HMO SPD consultation were available on the Council's Local Plan page . Details about the HMO SPD consultation was also sent from our planning database consisting of over 2000 email contacts to inform them of the consultation. However, it was an oversight to not also include details on the Council's consultation webpage.	No change to HMO SPD.

040002	Edward Walters	Member of the Public	Whole Document	HMO SPD does not mention or include any details of Purpose-Built Student Accommodation (PBSA) – to give a truer picture of HMO/PSBA concentration	Noted. The HMO SPD is a guidance document intended to provide clarity for the adopted HMO policy and does not therefore cover PBSA within the scope of HMOs. The draft Regulation 19 Local Plan was consulted on in February 2025 and recently submitted to the Planning Inspectorate. It includes a newly revised HMO Policy and an UWE policy , however these policy are not yet adopted. The adopted Core Strategy Policy CS28 shows a commitment with UWE to provide Purpose Built Student Accommodation (PBSA). However, PBSA will not be suitable for all students and therefore a proportion of students will continue to use Private Rental Sector.	No change to HMO SPD.
040003	Edward Walters	Member of the Public	5.3	Section should reference the ‘latest available census data’ not a dated version ie ‘Census 2021’	The Census is carried out every 10 years, with the next Census being 2031, therefore Census 2021 is the latest available and it is dated to ensure readers know when and where the data is drawn from.	No change to HMO SPD.
040004	Edward Walters	Member of the Public	5.3	Additional Explanatory Guidance 2’ replace “are unlikely to be in conformity” with “will be refused” for greater clarity.	Planning applications for HMO development are determined through the process of professional planning judgement in accordance with adopted local and national planning policy. Accordingly, as every application is assessed on its merits it may be appropriate that in some cases these exceed the 10% threshold, subject to appropriate reasons being given, which will form part of any overall planning balancing assessment exercise.	No change to HMO SPD
040005	Edward Walters	Member of the Public	Whole Document	Review language to eliminate ambiguity and reduce inconsistent	Noted. SPD is written with the objective to provide further advice as to how the Council’s adopted Development Plan policies used to consider applications for HMOs	No change to HMO SPD

				decisions or legal challenges	will be applied. Without specific examples being provided, the SPD is considered to be clear and explanatory.	
040006	Edward Walters	Member of the Public	5.4	Objection to suggestion that exceeding the threshold may still be acceptable rather set clear boundaries for both residents and developers	Planning applications for HMO development are determined through the process of professional planning judgement in accordance with adopted local and national planning policy. Accordingly, as every application is assessed on its merits it may be appropriate that in some cases these exceed the 10% threshold, subject to appropriate reasons being given, which will form part of any overall planning balancing assessment exercise.	No change to HMO SPD
040007	Edward Walters	Member of the Public	5.4	Request for clear guidance and examples on how to measure and calculate thresholds	The online Census mapping tool – shows the concentrations of HMOs above and below thresholds. Used in association with guidance set out at Chapter X provides guidance and examples on how to measure and calculate thresholds. Please note the map does not include small HMOs (4 bedrooms) as they are deemed to have a similar impact as a residential family home.	No change to HMO SPD
040008	Edward Walters	Member of the Public	5.3	Comment the HMO Mapping Locator Tool should be decoupled from the SPD and maintained as a separate reference tool, regularly updated with more features added for residents to identify impacts and the thresholds for HMOs.	Noted - Agreed	More prominence to be given to HMO map Locator Tool on HMO landing page and Planning policy pages

040009	Edward Walters	Member of the Public	Whole document	South Glos HMO SDP weaker than Bristol, proposal to set it as 10% HMO limit within a 100-metre radius	The approach set out within the SPD has been informed by a study carried out by the National HMO Lobby which considered that between 10% of properties and 20% of the population is the 'tipping point' for HMO dominance in a neighbourhood. In preparing the SPD the Council agreed a 10% threshold is widely accepted at neighbourhood level within similar SPDs of nearest neighbours Bristol and Bath and North East Somerset. However, there is insufficient evidence to support a more restrictive threshold within 100 metres at this time.	No change to HMO SPD
040010	Edward Walters	Member of the Public	4.2	Article 4 should cover all wards within the southern fringe of South Gloucestershire for balanced HMO distribution	Noted. Currently there is insufficient evidence to justify extending the existing A4D. Going forward, if the council considers there is sufficient evidence to justify introducing further A4Ds to protect the local amenity or the well-being of areas not presently covered by A4Ds, a business case will be prepared setting out the technical work needed to enable the council to take an informed decision on whether to create further A4D areas.	No change to HMO SPD
040011	Edward Walters	Member of the Public	4.1	HMO Licencing should apply for all HMOs and this data should be used to inform threshold calculations	Due to the HMO licensing requirements, only large HMOs are required to have a mandatory licence. It is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a register of small HMOs. The thresholds are calculated based on the data we have, as small HMOs have not been found to cause the same level of harm.	No change to HMO SPD
040012	Edward Walters	Member of the Public	Whole Document	Add HMO Policy to Local Plan to enhance internal space standards, set maximum number of	The draft Regulation 19 Local Plan was consulted on in February 2025 and recently submitted to the Planning Inspectorate. It includes a newly revised HMO Policy and an UWE policy , however these policies are not yet adopted. The adopted Core	No change to HMO SPD

				full time students outside PBSA, reduce student occupation in private rental sector (PRS), encouragement of PBSA over PRS	Strategy Policy CS28 shows a commitment with UWE to provide Purpose Built Student Accommodation (PBSA). However, PBSA will not be suitable for all students and therefore a proportion of students will continue to use the Private Rental Sector.	
040013	Edward Walters	Member of the Public	6.1e	Require a management plan for all HMO planning applications, detailing refuse management, property maintenance, tenant onboarding (including noise and parking expectations), and contact details for complaints	The HMO SPD includes clear guidance for landlords of HMO properties about how to apply for additional waste bins, ensure appropriate refuse storage, and avoid harmful impact on residential amenity, in accordance with national and local policy. This is set out in Tables 3 and 7 of the HMO SPD.	No change to HMO SPD
040014	Edward Walters	Member of the Public	6.1f	In areas with restrictions, students should be ineligible for parking permits	Noted. Parking permits fall outside of the remit of the SPD. Students are not treated differently to other residents when it comes to parking permits. Policies, Sites and Places DPD (2017) Policy PSP16 (Parking Standards) sets out comprehensive development plan policy requirements for the amount of car and cycle parking spaces required in proposed new development.	No change to HMO SPD
040015	Edward Walters	Member of the Public	6.1f	Prioritise cycle paths close to residences over parking	Noted. However this matter is outside of the scope of the SPD.	No change to HMO SPD

040016	Edward Walters	Member of the Public	1	SPD clarification to show it applies to conversions and new builds	Noted Additional wording suggested for clarification for Key Point 1. (page 3).	Section to be amended to read: “It is important to note that not all HMOs require planning permission. This document relates to the management of planning applications for new HMOs when planning permission is required. Within the <u>area covered by the Article 4 Direction area which came into force on 10th January 2024</u> , this will commonly include <u>applications to convert existing family housing to either a large HMO (for 7 or more unrelated people) and or a small HMO (of between 3 to 6 unrelated</u>
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						<p>people), or an enlarge of an existing small HMO to accommodate 7 or more people. Outside of the A4D area any proposals to convert an existing family house to an HMO for 7 or more unrelated people or to enlarge an existing 'large' HMO will fall under the jurisdiction of South Gloucestershire Council in its role as Local Planning Authority, as explained further in section 4. This document but also explains the role of the HMO licencing licensing regime which is a separate process that can relate to both HMOs which do, and do not, require</p>
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						planning permission.
040017	Edward Walters	Member of the Public	6d	All HMOs to require outdoor amenity space	Noted. Core Strategy (2013) Policy CS24 Green Infrastructure, Sport and Recreation Standards will apply to ensure outdoor space is adequate in terms of providing for the quantity, quality and accessibility to meet the projected needs arising from the future occupiers of new development.	No change to HMO SPD
040018	Edward Walters	Member of the Public	6.1f	Define clear standards for parking surveys	Noted. A technical advice note which provides guidance on parking standards is available at 3046-Parking-Survey-TAN.pdf	No change to HMO SPD
040019	Edward Walters	Member of the Public	6.1c	Add environmental sustainability requirements into the SPD and make mandatory for planning permission	Noted. The SPD is a guidance document specifically related to supporting the determination of planning applications for HMOs in accordance with PSP39. Other adopted Development Plan policies which cover other aspects of sustainability may also be relevant to determining HMO applications and this will be considered on a case by case basis	No change to HMO SPD
040020	Edward Walters	Member of the Public	8.1	Clarification needed on enforcement procedures for unauthorised HMOs	Noted. The Private Sector Housing Team continue to gather evidence to identify and tackle HMOs that should be subject to Mandatory Licensing. This includes responding to complaints and local intelligence from other Council departments and external agencies (e.g. Planning Enforcement, Waste Team, Building Control, Police and Emergency Services etc).	No change to HMO SPD

040021	Edward Walters	Member of the Public	Whole document	Create a partnership model with UWE to cover student accommodation strategy, management and enforcement arrangements (potential partnership with Avon and Somerset police), landlord accountability, 24hr neighbourhood helpline, tenant responsibilities and improved HMO registration.	Noted. The Council already works closely with UWE and maintains regular liaison in relation to the impact of HMOs within the local environs of UWE. UWE is also a key consultee/ stakeholder and works proactively with the Council and our partners in recognition that UWE is now integrated into a wider suburban context and serves as a hub for the local community around it. As UWE brings forward proposals to develop its campus it will be expected to play its part in creating a successful mixed community, including supporting community facilities and mitigating any arising impacts as appropriate and necessary.	No change to HMO SPD
040022	Edward Walters	Member of the Public	Whole Document	Collaborate with Bristol City Council for strategic oversight of HMO market to monitor housing availability, affordability and displacement.	As an adjoining local authority, the Council works closely with BCC on cross boundary matters of strategic importance which includes operation of the housing market and impact of HMOs on maintaining mixed and balanced communities. Examples of this include that each authority has adopted local plan policies and SPDs in place to support assessments of HMO planning applications.	No change to HMO SPD
050001	Alice Rainey	Member of the Public	Whole Document	Extending properties, converting houses to flats and developing in gardens for HMOs should not be permitted in small	Noted. Residential properties can be converted into small HMOs in all areas of South Gloucestershire without the need for planning under permitted development rights unless the area is covered by an Article 4 Direction (A4D). A4Ds are only introduced to remove national permitted development rights in instances	No change to HMO SPD

				residential towns like Thornbury.	where both evidence and subsequent justification underpin the case for withdrawal of these permitted development rights, in order to support the necessary protection of the local amenity and/or the wellbeing of the area.	
050002	Alice Rainey	Member of the Public	3.2	HMOs should be limited in estates where housing is dense, with narrow roads and small gardens lead to parking and privacy issues.	Noted. Policies, Sites and Places DPD (2017) Policy PSP16 (Parking Standards) sets out comprehensive development plan policy requirements for the amount of car and cycle parking spaces required in proposed new development. PSP8 Residential Amenity Policy sets out planning policy requirements where development proposals are unacceptable due to loss of privacy and overlooking.	No change to HMO SPD
050003	Alice Rainey	Member of the Public	3.2	HMOs in Filton have caused its decline, does not want the same to happen in Thornbury	Noted. The SPD identifies the contribution that HMOs can make to mixed and balanced communities, while also recognising the impacts they can potentially have if not managed effectively. To support the Council's commitment to sustainable communities the SPD also works alongside the Policies, Sites and Places DPD (2017) Policy PSP8 Residential Amenity which sets out the planning policy requirements for new development in relation to impact on the residential amenity of nearby properties and sets out impacts it deems unacceptable.	No change to HMO SPD
060001	Sally Parish	National Highways	Whole Document	No comments on proposed revisions	Noted	No change to HMO SPD
070001	Sharon Jenkins	Natural England	Whole Document	No comment on SPD as does not relate significantly to NE interests.	Noted	No change to HMO SPD

080001	Briony Waterman	Environment Agency	Whole Document	No comments to add	Noted	No change to HMO SPD
090001	Steve Reade	Member of the public	Whole Document	References to forthcoming Local Plan and its policies on large scale developments and HMOs would be beneficial	Noted. Whilst emerging policies will consider large scale developments and HMOs, these are not part of the adopted Development Plan and therefore fall out of scope of the existing SPD.	No change to HMO SPD
090002	Steve Reade	Member of the public	4.1	Clarification on possibility of owners/developers of multiple properties close together creating/ grouping the properties under one HMO to avoid Article 4/SPD	Noted. All HMOs within an Article 4 area need planning permission and would be subject to the sandwiching and percentage guidance in the SPD. The HMOs being in the same ownership is immaterial in planning terms and each one would be considered an individual HMO. Conversion of small properties to HMOs falls within permitted development rights so it is possible for multiple properties close together to be converted outside of A4D areas. However, the prospect of these being considered as a single planning unit highly unlikely. Creation of large HMOs (7 or more persons) outside A4D areas needs planning permission in all cases.	No change to HMO SPD
100001	Cllr Chris Willmore	Yate Town Council	Whole document	Supports all moves to strengthen regulatory control over HMOs	Noted.	No change to HMO SPD
100002	Cllr Chris Willmore	Yate Town Council	Section 5	Concern insufficient regulation of amenity standards for residents living in HMOs / co living and	Amenity standards for residents living in licensed HMOs are a consideration that must be made in accordance with section 65 of the Housing Act 2004, which is guided by South Gloucestershire Council's Room Size and Amenity Standards. Adherence with	No change to HMO SPD

				the impact upon neighbours.	these requirements is monitored during the inspection of each property concerned.	
100003	Cllr Chris Willmore	Yate Town Council	Section 3.2 and 6.1.f)	Concern of HMOs impact on parking spaces in areas already lacking	Policies, Sites and Places DPD (2017) Policy PSP16 (Parking Standards) sets out comprehensive development plan policy requirements for the amount of car and cycle parking spaces required in proposed new development. A technical advice note which provides guidance on parking standards is available at 3046-Parking-Survey-TAN.pdf	No change to HMO SPD
100004	Cllr Chris Willmore	Yate Town Council	Whole Document	Pre-emptive measures needed to avoid the need for Article 4 to be introduced as Article 4s do not reverse HMO application approval/licences in areas with high levels.	In accordance with NPPF para 54. Sufficient evidence is required in order for the Council to take action in areas with high levels of HMOs to justify the introduction of A4Ds to protect the local amenity or the well-being of areas. To take an A4D forward, a business case will need to be prepared setting out the technical work needed to enable the council to sufficiently justify the evidential case to take an informed decision on whether to create further A4D areas.	No change to HMO SPD
100005	Cllr Chris Willmore	Yate Town Council	Section 5.3	The threshold for regulatory response is too high as impacts are felt earlier than implied in the SPD.	The approach set out within the SPD has been informed by a study carried out by the National HMO Lobby which considered that between 10% of properties and 20% of the population is the 'tipping point' for HMO dominance in a neighbourhood. When the SPD was initially prepared a 10% threshold was introduced as this is widely accepted at neighbourhood level within similar SPDs of nearest neighbours Bristol and Bath and North East Somerset. However, there is insufficient evidence to	No change to HMO SPD

					support a more restrictive threshold within 100 metres at this time and therefore it was not considered appropriate or justified to revise this as part of the SPD Refresh.	
110001	Chris Barge	Member of the Public	3.2	Limit number of residents in HMOs and number on each street due to noise, parking and impact on family environment.	<p>Noted.</p> <p>The number of tenants in a licensed HMO is a consideration that must be made in accordance with section 65 of the Housing Act 2004, which is guided by South Gloucestershire Council's Room Size and Amenity Standards. Occupancy levels are clearly shown on any licence issued for the property and enforcement action can be taken for failure to comply.</p> <p>Policies, Sites and Places DPD (2017) Policy PSP16 (Parking Standards) sets out comprehensive development plan policy requirements for car and cycle parking spaces required in proposed new development. PSP8 Residential Amenity Policy sets out planning policy requirements where development proposals are unacceptable due to loss of privacy and overlooking.</p>	No change to HMO SPD
110002	Chris Barge	Member of the Public	6.1 b	Restrictions on conversions that sacrifice living space and garages which increase number of residents	<p>Noted.</p> <p>Currently, there are no space standards prescribed for HMOs within South Gloucestershire's Development Plan Documents. This means that whilst emerging policies will consider the need for internal space standards to meet the day-to-day needs of a range of potential occupiers, these are not part of the adopted Development Plan and therefore cannot be required through a planning</p>	No change to HMO SPD

					application. Residential amenity is nonetheless a consideration in any planning application and so as part of any HMO planning application, consideration is given to living conditions of future occupants. The Council as HMO licensing authority also has internal space and amenity standards that it applies when considering whether to grant any HMO license (a license is required for HMOs with 5 or more occupants). For the avoidance of doubt, licensing is separate to the planning process.	
110003	Chris Barge	Member of the Public	6.1 a) and e)	Need for better waste management at HMOs due to high amount of waste, provision of bin storage by landlord to avoid littering.	Noted. In 2019 the council adopted the Waste and Recycling Collection: Guidance for new developments SPD. This alongside the HMO SPD states the provision for waste management that applicants are encouraged to provide as part of submitting planning applications in accordance with the requirements of PSP39. Alongside this, UWE often run campaigns for students to help them understanding the importance of waste collection and management.	No change to HMO SPD
110004	Chris Barge	Member of the Public	6.1	Require a nominated contact person for each HMO for when problems occur to reduce public nuisance.	Noted. The Council can encourage individuals to interact with their neighbours and share contact details but cannot enforce the sharing of personal details.	No change to HMO SPD
110005	Chris Barge	Member of the Public	6.1.f)	Enforce ban on parking on the pavement and limit size of HMOs to avoid multiple cars per property	Parking enforcement is outside of the scope of the SPD as this is covered by separate legislation and regulations. Policies, Sites and Places DPD (2017) Policy PSP16 (Parking Standards) sets out comprehensive development plan policy requirements for the	No change to HMO SPD

					amount of car and cycle parking spaces required in proposed new development, which includes standards for HMOs. Compliance against these standards, taking into account any local factors as relevant, are used in the assessment and determination of planning applications. To support this a technical advice note which provides guidance on parking standards is available at 3046-Parking-Survey-TAN.pdf .	
110006	Chris Barge	Member of the Public		HMOs should all be licenced and be on a publicly accessible register so residents can contact landlords with issues.	Due to the HMO licensing requirements, only large HMOs are required to have a mandatory licence. There is not a register of landlords in England currently, the Renters Reform Bill aims to introduce this so this may be possible in the future. When the new Locator Map goes live any small sites granted planning permission since January 2024 (i.e. since the A4Ds came into effect) will be shown. Small sites (which are not licensed) in operation before 2024 will continue not be shown as these are not covered by the HMO licencing scheme.	No change to HMO SPD
120001	Martin Bull	Member of the Public		Will HMOs be used to house “illegal immigrants”	Any HMOs that may be used to house asylum seekers are licensed as appropriate by the Private Sector Housing team to ensure compliance with housing standards and are fully managed by the Home Offices’ appointed Housing Provider.	No change to HMO SPD
130001	Cllr Andrew Shore	Stoke Gifford Parish Council	5.4	Disagree with the proposed addition as concerned it will be used to justify overriding the 10% threshold approach.	Noted. Change in wording for clarification.	“Exceeding a threshold alone may not indicate the proposal is unacceptable. In such instances for

				<p>Insufficient explanation for when an assessment needs to be made, how the assessment will be done and what the assessment will be looking for. If additions needed they should be re-worded to say “Whilst exceeding a threshold is likely to indicate a proposal is unacceptable, in some situations exceeding a threshold alone may not indicate the proposal is unacceptable”. If wording remains, include possibility for situations in which the threshold is not breached, but (especially if close to the threshold) an HMO proposal can still be unacceptable.</p>		<p>example where the 10% threshold is exceeded in a locality, an assessment will still need to be made as to whether there are any harmful impacts.”</p> <p>Proposed change:</p> <p><i>“Exceeding a threshold may indicate that a proposal is unacceptable. However, an assessment will be required by the Planning Officer where a threshold is exceeded as to whether there are any harmful impacts and what they are.”</i></p>
130002	Cllr Andrew Shore	Stoke Gifford Parish Council	6.1 Table 7	Propose additional bullet point for vermin reduction	Guidance relating to the external appearance & correct storage of waste is covered in Section 6 in table 3 – 6. Achieving good standards of	No change to HMO SPD

				measures: “As a landlord, you should also check the facilities for storing waste & recycling are sufficient in size for the tenants, with due regard to the external appearance and health & safety in the area, promptly arranging for additional bin provision and off-street bin storage where appropriate”	accommodation. The additional wording proposed is considered to be more appropriate as information to be provided by the Council’s Waste and Private Sector Housing Teams. However, it is understood that Landlords can apply for additional black bins and recycling containers free of charge and they need to ensure external waste storage and recycling provision are well designed, easily accessed and within enclosed structure.	
130003	Cllr Andrew Shore	Stoke Gifford Parish Council	6.1 Table 7	Change wording in 3 rd bullet in third section to be ‘or’ instead of ‘and’ to read as “Take appropriate action where your tenants are not managing their waste in accordance with the Council’s requirements, or if appropriate, your HMO licence conditions”	Noted. The Council considers this sentences’ syntax to be appropriate as drafted.	No change to HMO SPD
140001	Amartya Deb	Gloucestershire County Council	Whole document	Query from GCC officers’ for evidence or recognition of the	While HMOs are exempt from achieving mandatory Biodiversity Net Gain (BNG, the SPD cross refers to Policy PSP43. This requires developments to provide	No change to HMO SPD

				importance of nature and biodiversity with respect to HMOs, particularly the protection of “small greenspaces”.	adequate access to private outdoor space and the important role this plays in people’s physical and mental health and wellbeing, including space to enjoy wildlife and a place to grow plant/ vegetables.	
140001	Amartya Deb	Gloucestershire County Council	6.1 Table 4	Query on how energy performance ratings will impact and apply to listed buildings.	Noted. Due to the rules around Energy Performance Certificates (EPCs) and the Minimum Energy Efficiency Standards for Homes for Listed Buildings, we advise Landlords to seek a pre-application discussion with the Council, as even small changes to Listed Buildings may need permission.	Additional text added to SPD to ensure Listed Buildings are covered when detailing energy efficiency requirements for HMOs
150001	Melanie Lindsley	The Coal Authority		No specific comments on this document.	Noted	No change to HMO SPD
160001	Sejal Hampson	Member of the public	5.3	SGC is claiming the HMO mapping tool is part of the SPD, when it is only referenced by the SPD.	Noted. The mapping tool is part of the SPD. However more prominence will be given to HMO map Locator Tool on HMO landing page and Planning policy pages.	No change to HMO SPD however more prominence to be given to HMO map Locator Tool on HMO landing page and Planning policy pages
160002	Sejal Hampson	Member of the public	Whole document	Is the council trying to do this consultation under the radar?	Details of the HMO SPD consultation were available on the Council’s Local Plan page . Details about the HMO SPD consultation was also sent from our planning database consisting of over 2000 email contacts to inform them of the consultation. .	No change to HMO SPD

160003	Sejal Hampson	Member of the public	5.3	Threshold must consider small HMOs. Small HMOs should require planning consent not be able to use permitted development.	Permitted Development rights are set nationally by government through the General Permitted Development Order (GDPO). This can only be changed if the permitted development rights are removed through an Article 4 Direction.	No change to HMO SPD
160004	Sejal Hampson	Member of the public	6.1.f)	Current car parking space allowance is not fit for purpose; change to 1 space per bedroom. Not allow usage of on street parking by not allowing permits.	Noted. Amending car parking standards is out of scope of this SPD as that is a planning policy matter. Policies, Sites and Places DPD (2017) Policy PSP16 (Parking Standards) sets out comprehensive development plan policy requirements for the amount of car and cycle parking spaces required in proposed new development. HMOs can have an increased number of adults compared to family homes however there is limited evidence showing every resident will own a car. Increasing the number of car parking spaces per resident would enable higher car ownership rather than relieve the problem of insufficient car parking spaces. A technical advice note which provides guidance on parking standards is available at 3046-Parking-Survey-TAN.pdf . Management of parking permits is outside the remit of the SPD.	No change to HMO SPD
160005	Sejal Hampson	Member of the public	5.3	Mapping tool does not pick up small HMOs, so the method is ineffective.	Noted. Small HMOs are not recorded on the Mapping Locator Tool as planning permission is not required, as small HMOs (occupied by three to six persons) will have been developed through use of permitted development rights, whereas large HMOs (seven persons or above), or intensification of an existing HMO property that would result in it becoming a large	No change to HMO SPD

					<p>HMO, require planning permission. This is explained in Figure 1 of the HMO SPD.</p> <p>Moreover, it should also be noted that the 3 and 4 people HMO's are much more akin to a normal family house and there will be plenty of rented and owner occupied single family houses with more occupants, especially with the current housing market with extended families living together. This is one of the reasons licensing is required for HMO's with 5 or more occupants and not the smaller ones and therefore why the Council does not record any small (unlicensed) HMOs on the locator map.</p> <p>Furthermore, due to the HMO licensing requirements, where only large HMOs are required to have a mandatory licence, it is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a register of small HMOs, however, small HMOs are required to fully comply with The Housing Act 2004.</p> <p>When the new map goes live any small sites granted planning permission since January 2024 (i.e. since the A4Ds came into effect) will be shown. Small sites (which are not licensed) in operation before 2024 will continue not be shown.</p>	
160006	Sejal Hampson	Member of the public	5.3	Small HMOs should require licences as well as planning consent	Due to the HMO licensing requirements, only large HMOs are required to have a mandatory licence. It is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a register of small HMOs. Moreover, it should also be noted that the 3	No change to HMO SPD

					and 4 people HMOs are much more akin to a normal family house and there will be plenty of rented and owner-occupied single-family houses with more occupants, especially with the current housing market with extended families living together. When the new Locator Map goes live any small sites granted planning permission since January 2024 (i.e. since the A4Ds came into effect) will be shown. Small sites (which are not licensed) in operation before 2024 will continue not be shown as these are not covered by the HMO licencing scheme.	
160007	Sejal Hampson	Member of the public	6.1.d)	Ban on landlords removing lounges and converting garages as this impacts communal spaces and parking.	Noted. As stated in the SPD (page 24 – paragraph b): <i>“Currently, there are no space standards prescribed for HMOs within South Gloucestershire’s Development Plan Documents. Whilst emerging policies will consider the need for internal space standards to meet the day-to-day needs of a range of potential occupiers, which will meet the National Described Space Standards as a minimum, these are not part of the adopted Development Plan and therefore cannot be required through a planning application.”</i> Applications for HMOs are therefore considered on their merits in accordance with Policy PSP39.	No change to HMO SPD
160008	Sejal Hampson	Member of the public	2.	Article 4 should be extended into other areas of South Gloucestershire	In accordance with NPPF para 54 Sufficient evidence is required in order for the Council to take action in areas with high levels of HMOs to justify the introduction of A4Ds to protect the local amenity or the well-being of areas. To take an A4D forward a business case will need to be prepared setting out the technical work needed to enable the council to	No change to HMO SPD

					sufficiently justify the evidential case to take an informed decision on whether to create further A4D areas.	
160009	Sejal Hampson	Member of the public	2.	Article 4 should remove permitted development rights for small HMOs, requiring planning permission.	Noted. In an area with an Article 4 Direction all new HMOs require planning permission irrespective of size.	No change to HMO SPD
160010	Sejal Hampson	Member of the public	8.	Council should take a stricter approach to failure to license an HMO with unlimited fines and rent repayment orders.	Noted. The Private Sector Housing Team manage licensing. As outlined in the SPD 8.1 : <i>“Failure to apply for a licence when required is an offence punishable on summary conviction to an unlimited fine. Alternative sanctions include offering a Simple Caution or issuing a Civil Penalty Notice of up to £30,000.”</i>	No change to HMO SPD
160011	Sejal Hampson	Member of the public	8.	Poor landlord behaviour needs sanctioning and permanent banning from holding licences to protect communities and renters.	Poor landlord behaviour in licensed HMOs is a consideration that must be made in accordance with section 66 of the Housing Act 2004. In instances where landlord behaviour or management is a concern, the Private Sector Housing team may issue a shorter licence and monitor any issues prior to considering either the extension or re-issue of a further licence. Banning Orders have already been introduced under Part 2 of the Housing and Planning Act 2016 and are aimed at any landlords who flout their legal obligations and rent out accommodation that is substandard. These sanctions are used for the most serious offenders.	No change to HMO SPD

					The Renter's Rights Bill that is due to apply from May 2026 will require Landlords in England to be on a register for better accountability.	
160012	Sejal Hampson	Member of the public	6.1	Stronger waste and noise enforcement, recent FOI shows there has been little issuing of CPNS and CPWS	The Environmental Enforcement Policy addresses how waste mismanagement is enforced and fined. Waste management is also part of licencing conditions so negligence from the landlord could result in enforcement action being taken against the licence holder, depending on the circumstances. Enforcement is carried out based on the reporting of Refuse Collectors or local residents. The Council's Environmental Protection team deal with the enforcement of noise nuisance under the Environmental Protection Act 1990, which has alternative enforcement actions other than CPNs or CPWs.	No change to HMO SPD
160013	Sejal Hampson	Member of the public	4.1	Introduce family protection clauses to the SPD, possible approaches: <ul style="list-style-type: none"> Clearly define what constitutes a "family" in the SPD, emphasizing relationships and shared living arrangements. Limit HMO occupancy to family members, restricting unrelated 	Noted. <i>Section 4.1</i> of the SPD explains what is generally considered to be an HMO in planning terms, referencing the original definition set under the Housing Act 2004, with a definition of HMOs introduced to the <i>Use Classes Order</i> for planning decisions in 2010. Our commitment to mixed and balanced communities, is highlighted in Core Strategy (2013) Policy CS17 Housing Diversity. The 2021 census of South Gloucestershire had 67.9% of households as single family households, 26% as one-person households and only 4.1% being other household types of which would include HMOs. Private family numbers are significantly larger than the number of single and other types of household structures so it	No change to HMO SPD

				<p>individuals from sharing facilities.</p> <ul style="list-style-type: none"> • Establish thresholds for HMO concentration, preventing excessive student HMOs in specific areas. • Prohibit "sandwiching" (a single residential dwelling between two HMOs) and limit adjacent HMOs to maintain community character. • Ensure effective licensing and enforcement mechanisms to monitor HMO compliance with family clauses. • Ensure any family clause has clear definitions, factors in diverse family structures and uses local context. 	<p>would be unnecessary to restrict non family households.</p> <p>In regard to HMO concentration, the approach set out within the SPD has been informed by a study carried out by the National HMO Lobby which considered that between 10% of properties and 20% of the population is the 'tipping point' for HMO dominance in a neighbourhood. We agreed a 10% threshold is widely accepted at neighbourhood level within similar SPDs of nearest neighbours Bristol and Bath and North East Somerset. However, there is insufficient evidence to support a more restrictive threshold within 100 metres at this time. However, in non-Article 4 Direction area, small HMOs do not require planning permission so there is a possibility of sandwiching of adjacent properties.</p>	
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160014	Sejal Hampson	Member of the public	Whole document	<p>Add student accommodation to SPD. Examples of methods:</p> <ul style="list-style-type: none"> • Develop policies with community engagement and stakeholders' involvement. • Identify specific areas for student accommodation with community. • Purpose-Built Student Accommodation (PBSA) instead of HMOs to create balance. • Develop co-living models promoting sustainable student accommodation. • Tailor policies to local area factoring in needs, demographics and concerns. • Use clear definitions in policies. 	<p>The HMO SPD is a guidance document intended to provide clarity for the adopted HMO policy and does not therefore cover PBSA within the scope of HMOs. The Regulation 19 emerging Local Plan was available for public consultation for 6 weeks in February 2025 and recently submitted to the Planning Inspectorate. It includes a newly revised HMO Policy and an UWE policy, however these policy are not yet adopted. The adopted Core Strategy Policy CS28 shows a commitment with UWE to provide Purpose Built Student Accommodation (PBSA). However, PBSA will not be suitable for all students and therefore a proportion of students will continue to use Private Rental Sector. Proposed changes to the National Planning Policy Framework (NPPF), Local Planning Authorities will have a requirement to produce Local Plans within a 30-month timeframe, giving local communities the opportunity to comment and feedback on draft Local Plans on more frequent intervals.</p>	No change to HMO SPD
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				Regularly review and update policies, responding to changing student needs and community feedback.		
160015	Sejal Hampson	Member of the public	4/ whole document	Article 4 insufficient as SPD is too weak. There is clearly a lot which can be updated in the SPD to protect communities, students and renters.	Noted. The SPD is a guidance document only, produced to provide clarity to the adopted HMO policy PSP39. The emerging Local Plan recently submitted for examination includes a bespoke HMO policy LP15, however as this has not yet been adopted, it carries little and limited weight but will do once the new Local Plan is adopted.	No change to HMO SPD
170001	Rebecca Williams	Member of the public	5.2/5.3	Strengthen the guidance on Proximity and Density (“Sandwiching”) of HMOs by aligning threshold with Bristol and B&NES and North Somerset and set as 10% and proximity defined as within a 100m radius. Include these under definitions of HMO tipping points.	The approach set out within the SPD has been informed by a study carried out by the National HMO Lobby which considered that between 10% of properties and 20% of the population is the ‘tipping point’ for HMO dominance in a neighbourhood. We agreed a 10% threshold is widely accepted at neighbourhood level within similar SPDs of nearest neighbours Bristol and Bath and North East Somerset. However, there is insufficient evidence to support a more restrictive threshold within 100 metres at this time.	No change to HMO SPD
170002	Rebecca Williams	Member of the public	5.3	Use local census data to calculate current HMO density (including those	Noted. The HMO Locator Map is based on Census data. Small HMOs are not currently recorded as their impacts on local areas are similar to a family home.	No change to HMO SPD

				without licences) in Article 4 area before approving any other HMOs.	Within A4D areas all HMO applications, whether large or small, require planning permission.	
170003	Rebecca Williams	Member of the public	6.1.f)	<p>Increase in illegal and unsafe parking due to overconcentration of residents and higher car ownership so current parking guidance needs to go further:</p> <ul style="list-style-type: none"> • Require applicants to demonstrate availability of off-street parking provision equal number of occupants in HMO. • Disclosure of parking arrangements is a licence condition and required in all advertising. • Consider licence suspension or refusal for repeated breaches of parking-related conditions. 	<p>Noted.</p> <p>A technical advice note which provides guidance on parking standards is available at 3046-Parking-Survey-TAN.pdf. Where breaches of parking and other licensing conditions occur, this is managed by the Private Sector Housing Team.</p>	No change to HMO SPD
170004	Rebecca Williams	Member of the public	6.1	Increase black bin provision in HMOs to one black bin per 2	The HMO SPD includes clear guidance for landlords of HMO properties about how to apply for additional waste bins, ensure appropriate refuse storage, and	No change to HMO SPD

				occupants. As independent occupants produce more waste and recycling than a family.	avoid harmful impact on residential amenity, in accordance with national and local policy. This is set out in Tables 3 and 7 of the HMO SPD.	
170005	Rebecca Williams	Member of the public	6.1.e)	Strengthen guidance to ensure adequate off-road spaces for bin storage is considered in the planning stages.	Noted. The SPD (Page 29 – paragraph e) highlights the need for sufficient, accessible and discrete bin storage as it is required by the National Planning Policy for Waste (NPPW).	No change to HMO SPD
170006	Rebecca Williams	Member of the public	8.	Increase penalties for landlords not providing the necessary number of bins.	Noted. This is a matter outside of the scope of the SPD and would need to be considered by the Council's Waste Management and Private Sector Housing teams in accordance with the application of their regulatory powers and responsibilities. As we do not currently have a set number of bins per resident this it difficult to enforce. However, there is a penalty of up to £80 for households not presenting domestic waste properly. If the council are receiving persistent evidenced waste complaints regarding any property, then adequate bin provision would be considered as part of any investigation and addressed in any appropriate enforcement action taken.	No change to HMO SPD
170007	Rebecca Williams	Member of the public	6.1.	Make pre-licence property inspections mandatory to verify compliance with minimum	Noted. All properties that require licensing are inspected prior to any licence being issued in most cases, to ensure compliance with licensing requirements. The cost of inspecting these properties is something that	No change to HMO SPD

				accommodation standards. Inspections could be funded through a landlord-paid fee, in addition to the licence cost.	is already funded via the licence fee that is paid by the landlord that applies.	
170008	Rebecca Williams	Member of the public	8.	Where landlords have made property modifications before planning approval that these are corrected if planning is not awarded before the property can be rented.	Noted. The Council's planning enforcement procedures will apply where changes have been made to the property outside of permitted development; concerns need to be logged on our website or emailed to planningenforcement@southglos.gov.uk .	No change to HMO SPD
170009	Rebecca Williams	Member of the public	6.1 e)	Tighten the minimum standards for shared living spaces; include requirements of natural light, sound proofing. Where some of these are currently in place, they are not being implemented and needs to be monitored and enforced.	The regulation of housing standards is covered by Part 1 of the Housing Act 2004. Adherence with these requirements is monitored during the inspection of each property concerned on either a proactive or reactive basis.	No change to HMO SPD
170010	Rebecca Williams	Member of the public	5	Ensure clear guidance on minimum provision of items such as	Clear guidance on this can be found here: South Gloucestershire Council's Room Size and Amenity Standards for Licensable Houses in Multiple	No change to HMO SPD

				ovens and fridges and ensure these are provided.	Occupation (HMOs) under Part 2 of the Housing Act 2004	
170011	Rebecca Williams	Member of the public	Whole document	Prohibit the licensing of HMOs on non-adopted roads or land	Noted. Unless the property in question is a large HMO or a small HMO in an A4D area then the landowner is able to convert a residential property to a small HMO under permitted development rights without planning permission. The licensing of properties is covered by the Private Sector Housing Team which operates separately to requirements to obtain planning permission under the Town and County Planning system	No change to HMO SPD
170012	Rebecca Williams	Member of the public	8	Current fines for breaching HMO licence conditions are too low and too delayed to deter non-compliance, suggest introducing on the spot fines proportionate to rental income; increase speed and visibility of enforcement actions and publish a clear enforcement protocol so residents and tenants understand how breaches will be addressed.	South Gloucestershire Council actively takes enforcement action against breaches of HMO licence conditions and unlicensed HMOs. Our Civil Penalty Notice (CPN) policy, which sets out how penalties are applied, is published on our website for transparency. While current legislation prescribes the framework for penalties, we use all available powers to ensure compliance, including imposing civil penalties of up to £30,000 per offence and, where appropriate, pursuing prosecution. Introducing on-the-spot fines proportionate to rental income would require a change in national legislation, which is outside the Council's remit.	No change to HMO SPD

170013	Rebecca Williams	Member of the public	6.1/8	Increase HMO licence fee to cover cost of planning and enforcing HMOs and cover cost of additional waste collections and noise complaint call outs.	Licences are administered by the Private Sector Housing team and this falls outside the remit of the HMO SPD.	No change to HMO SPD
170014	Rebecca Williams	Member of the public	6.1.d)	Urge the council to look beyond existing model and implement good standards of living for tenants and the local community.	Noted. The SPD is a guidance document only, produced to provide clarity to the adopted HMO policy PSP39. The emerging Local Plan recently submitted for examination includes a bespoke HMO policy LP15, as well as LP18: Internal space and accessibility standards and LP30: Private & communal amenity space standards aim to address the issues highlighted. However, as this has not yet been adopted, they currently carry little and limited weight but will do once the new Local Plan is adopted.	No change to HMO SPD
170015	Rebecca Williams	Member of the public	6.1	Ensure the SPD offers clear criteria and guidance that is enforceable particularly on density, parking, waste management, living conditions, inspections and enforcement.	Noted. The SPD is a guidance document only, produced to provide clarity to the adopted HMO policy PSP39. An application of enforcement powers therefore falls outside of the scope of the SPD. .	No change to HMO SPD
180001	Julie Borowski	Member of the public	5.3	Introduce or strengthen "HMO density thresholds" to limit the	The approach set out within the SPD has been informed by a study carried out by the National HMO Lobby which considered that between 10% of properties and 20% of the population is the 'tipping	No change to HMO SPD

				concentration (number) of HMOs in neighbourhoods. These should reflect national guidance where more than 10% is considered harmful.	point' for HMO dominance in a neighbourhood. We agreed a 10% threshold is widely accepted at neighbourhood level within similar SPDs of nearest neighbours Bristol and Bath and Northeast Somerset. However, there is insufficient evidence to support a more restrictive threshold within 100 metres at this time.	
180002	Julie Borowski	Member of the public	6.1.a)	Landlord removal of vegetation for parking spaces impacts the visual amenity of the area, adversely affects the local fauna and if tarmac replaces lawns creates increase water run off.	Noted. Adopted Policy PSP38 ensures development within existing residential curtilages will be acceptable where they would not prejudice the provision of adequate private amenity space, or lead to the loss of trees and vegetation that provide valuable relief in highly built up localities or garden(s) that form part of a settlement pattern that contributes significantly to local character.	No change to HMO SPD
180003	Julie Borowski	Member of the public	6.1.g)	Students in HMOs can exhibit a range of antisocial behaviour impacting local residents.	Noted. Landlords are responsible for taking action where tenants are found to be causing any antisocial behaviour that impacts residents. If the council receive any persistent and evidenced complaints regarding anti-social behaviour, this will be considered as part of any investigation and addressed in any appropriate enforcement action taken.	No change to HMO SPD
180004	Julie Borowski	Member of the public	6.1.d)	Converted family homes into HMOs often result in unacceptable living conditions	Table 4 of the HMO SPD includes guidance for landlords and developers to seek to ensure that appropriate space standards are met within new HMO development. Landlords seeking to obtain a mandatory HMO licence are also directed on page 20	No change to HMO SPD

					of the HMO SPD to the South Gloucestershire Room Size and Amenity standards guide.	
180005	Julie Borowski	Member of the public	6.1.e)	<p>Build up of refuse outside properties not being collected due to:</p> <ul style="list-style-type: none"> • Incorrect recyclable waste in incorrect receptacles • Waste collectors not emptying bins which do not have closed lids <p>Overfilled and uncollected waste leads to birds, foxes and vermin.</p>	<p>Noted.</p> <p>In 2019 the council adopted the Waste and Recycling Collection: Guidance for new developments (Supplementary Planning Document). This alongside the HMO SPD explains how the provision for waste management is considered at planning permission stage. The Council also works closely with UWE on campaigns for student's to better understand their waste collection and management responsibilities. The Environmental Enforcement Policy addresses how waste mismanagement is enforced and fined. Waste management is also part of licencing conditions so negligence from the landlord could result in enforcement action being taken against the licence holder, depending on the circumstances. Enforcement is carried out based on the reporting of Refuse Collectors or local residents. If the council are receiving persistent evidenced waste complaints regarding any property, then adequate bin provision would be considered as part of any investigation and addressed in any appropriate enforcement action taken.</p>	No change to HMO SPD
180006	Julie Borowski	Member of the public	5.2	Stoke Park already has an excessive number of HMOs, some have had a negative impact on the permanent residents and the environment, no further HMO planning	For many people HMOs provide a practical and affordable housing option that meets their housing needs for private rented housing including young professionals 'house-shares' and students wanting to live off campus. However, the Council is also aware that the increase in this type of development in South Gloucestershire has resulted in concentrations of HMOs in particular parts of the district which has, in some cases, heightened	No change to HMO SPD

				<p>applications should be granted.</p>	<p>concerns from neighbouring properties and the wider community with regard to parking pressures, noise, management of waste and recycling and anti-social behaviour.</p> <p>While the Council can't simple prevent HMO planning applications from being submitted, every planning decision does involve the consideration of the issues for and against the proposed development, what is often referred to as the planning balance or balancing of the planning issues. The HMO SPD alongside adopted development plan policy PSP39 sets out the criteria and guidance that will be used to consider the impact of HMOs that require planning permission on the character and amenity of local areas within which they are proposed to be located. These in association with the defined A4D area are used by the Council to consider whether HMOs, where they require planning permission, creates, or contributes to, a harmful concentration of HMOs within both a locality and at individual street level.</p>	
180007	Julie Borowski	Member of the public	5.2	<p>Too many HMOs on streets directly impact on issues like noise and waste pollution. Not allowing 'sandwiching' of residential properties by HMOs which is considered harmful to an area.</p>	<p>The Council is aware that the increase in this type of development in South Gloucestershire has resulted in concentrations of HMOs in particular parts of the district which has, in some cases, heightened concerns from neighbouring properties and the wider community with regard to parking pressures, noise, management of waste and recycling and anti-social behaviour. The SPD seeks to provide guidance on how the location of new HMOs will be considered, taking into account existing numbers of HMOs in the area, to avoid concentrations which could be</p>	<p>No change to HMO SPD</p>

180008	Julie Borowski	Member of the public	5.2	Expand threshold assessments beyond street-level "sandwiching" to include broader neighbourhood-level assessment that accounts for the cumulative impacts across whole areas like Cheswick, Stoke Park and Scholars Chase.	harmful to local amenity. It also provides guidance on how good standards of accommodation can be met, including through appropriate waste management and parking provision. The threshold guidance is set at 20% within 100 metres, which is considered to be an appropriate measure to be used to assess whether localities are likely to experience harm to their character and amenity, as a result of an over concentration of HMOs.	
180009	Julie Borowski	Member of the public	5.3	Ensure that the threshold calculation accurately counts all relevant residential properties and multiple HMOs with a FIXED map system. Council mapping does not include small unlicensed HMOs (3 beds or less) and the Council does not have accurate data on how many HMOs are operating in this area when they approve new ones.	Due to the HMO licensing requirements, where only large HMOs are required to have a mandatory licence, it is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a register of small HMOs. Moreover, it should also be noted that the 3 and 4 people HMO's are much more akin to a normal family house and there will be plenty of rented and owner occupied single family houses with more occupants, especially with the current housing market with extended families living together. When the new map goes live any small sites granted planning permission since January 2024 (i.e. since the A4Ds came into effect) will be shown. Small sites (which are not licensed) in operation before 2024 will continue not be shown as explained above	No change to HMO SPD
180010	Julie Borowski	Member of the public	6.1.f)	Insufficient parking spaces for number of	Policies, Sites and Places DPD (2017) Policy PSP16 (Parking Standards) sets out comprehensive	No change to HMO SPD

				<p>residents in HMOS leading to illegal parking and blocking of pavements. Require minimum provision of car parking and secure, covered cycle parking (one space per bedroom).</p>	<p>development plan policy requirements for the amount of car and cycle parking spaces required in proposed new development. This policy is used to assess planning applications for HMOs.</p>	
180011	Julie Borowski	Member of the public	6.1.g)	<p>Encourage planning layouts that avoid conflicts with neighbours, such as avoiding the placing of communal areas opposite other residential properties. Include detailed guidance that prevents garages being used as the communal living space. Factor in areas for bin storage</p>	<p>The Council has a number of adopted planning policies that are used to ensure appropriate residential design quality is achieved in new developments. With regard to HMO planning applications policy PSP8 Residential Amenity sets out planning policy requirements. In 2019 the council adopted the Waste and Recycling Collection: Guidance for new developments (Supplementary Planning Document). The SPD highlights the need for sufficient, accessible and discrete bin storage as it is required by the National Planning Policy for Waste (NPPW).</p>	No change to HMO SPD
180012	Julie Borowski	Member of the public	5.3	<p>Provide more detailed and clearer guidance on how density threshold calculations are applied and how different types of properties are</p>	<p>Noted. The SPD explains the difference between small and large HMOs and the planning policy provisions that apply to each. Due to the HMO licensing requirements, only large HMOs are required to have a mandatory licence. It is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a</p>	No change to HMO SPD

				counted within the calculations. Include stipulations for HMOs of all sizes to be counted not just large HMOs	register of small HMOs. The thresholds are calculated based on the data we have, as small HMOs have not been found to cause the same level of harm as they are generally considered to be more akin to family housing.	
180013	Julie Borowski	Member of the public	6.1.e)	Include mandatory additional bins and develop stricter policies on waste management and enforcements if waste is not cleared.	<p>The Environmental Enforcement Policy addresses how waste mismanagement is enforced and fined. Waste management is also part of licencing conditions so negligence from the landlord could result in enforcement action being taken against the licence holder, depending on the circumstances. As we do not currently have a set number of bins per residence this it difficult to enforce. However, there is a penalty of up to £80 for households not presenting domestic waste properly.</p> <p>If the council are receiving persistent evidenced waste complaints regarding any property, then adequate bin provision would be considered as part of any investigation and addressed in any appropriate enforcement action taken.</p>	No change to HMO SPD
190001	Colin Carroll	Member of the public	5.3	SPD should reflect national guidance of what is considered harmful which is 10% concentration of HMOs.	The approach set out within the SPD has been informed by a study carried out by the National HMO Lobby which considered that between 10% of properties and 20% of the population is the 'tipping point' for HMO dominance in a neighbourhood. We agreed a 10% threshold is widely accepted at neighbourhood level within similar SPDs of nearest neighbours Bristol and Bath and Northeast Somerset. However, there is insufficient evidence to support a more restrictive threshold within 100 metres at this time.	No change to HMO SPD

190002	Colin Carroll	Member of the public	5.2	Sandwiching threshold assessment should also consider neighbourhood level to look at cumulative impacts.	The SPD seeks to provide guidance on how the location of new HMOs will be considered, taking into account existing numbers of HMOs in the area, to avoid concentrations which could be harmful to local amenity. It also provides guidance on how good standards of accommodation can be met, including through appropriate waste management and parking provision. The threshold guidance is set at 20% within 100 metres, which is considered to be an appropriate measure to be used to assess whether localities are likely to experience harm to their character and amenity, as a result of an over concentration of HMOs.	No change to HMO SPD
190003	Colin Carroll	Member of the public	5.3	Mapping system should be fixed and include unlicensed HMOs before SGC approves any more.	Due to the HMO licensing requirements, where only large HMOs are required to have a mandatory licence, it is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a register of small HMOs. Moreover, it should also be noted that the 3 and 4 people HMO's are much more akin to a normal family house and there will be plenty of rented and owner occupied single family houses with more occupants, especially with the current housing market with extended families living together. When the new map goes live any small sites granted planning permission since January 2024 (i.e. since the A4Ds came into effect) will be shown. Small sites (which are not licensed) in operation before 2024 will continue not be shown as explained above.	No change to HMO SPD
190004	Colin Carroll	Member of the public	6.1.f)	Require one car parking space and secure bike storage per bedroom	Noted. Policies, Sites and Places DPD (2017) Policy PSP16 (Parking Standards) sets out comprehensive development plan policy requirements for car and	No change to HMO SPD

					<p>cycle parking spaces required in proposed new development.</p> <p>A technical advice note which provides guidance on parking standards is available at 3046-Parking-Survey-TAN.pdf.</p>	
190005	Colin Carroll	Member of the public	6.1.g)	<p>Encourage HMO specific planning layouts to avoid conflicts with neighbours such as; avoid placing communal areas opposite other residences' communal areas, bin storage facilities and prevention of garages being used as communal living spaces.</p>	<p>The Council has a number of adopted planning policies that are used to ensure appropriate residential design quality is achieved in new developments. With regard to HMO planning applications policy PSP8 Residential Amenity sets out planning policy requirements. Guidance in the SPD in Table 9 explains how to interpret PSP8 to avoid noise impact on neighbouring properties. In 2019 the council adopted the Waste and Recycling Collection: Guidance for new developments (Supplementary Planning Document). The SPD highlights the need for sufficient, accessible and discrete bin storage as it is required by the National Planning Policy for Waste (NPPW).</p>	No change to HMO SPD
190006	Colin Carroll	Member of the public	5.3	<p>More detailed and clearer guidance needed on how density thresholds are applied and have all sizes of HMO included.</p>	<p>Noted. The SPD explains the difference between small and large HMOs and the planning policy provisions that apply to each. Due to the HMO licensing requirements, only large HMOs are required to have a mandatory licence. It is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a register of small HMOs. The thresholds are calculated based on the data we have, as small HMOs have not been found to cause the same level of harm as they are generally considered to be more akin to family housing.</p>	No change to HMO SPD

190007	Colin Carroll	Member of the public	6.1.e)	Include mandatory additional bins and develop stricter policies on waste management and enforcements if waste is not cleared.	Noted. In 2019 the council adopted the Waste and Recycling Collection: Guidance for new developments (Supplementary Planning Document). This outlines that “additional recycling containers are recommended for HMOs (free of charge) and landlords can apply for an extra capacity residual bin on behalf of their tenants. An annual administration charge is applied to the extra capacity residual bin service.” The Environmental Enforcement Policy addresses how waste mismanagement is enforced and fined. Waste management is also part of licencing conditions so negligence from the landlord could impact future licence renewal. Enforcement is carried out based on the reporting of Refuse Collectors or local residents.	No change to HMO SPD
200001	Suzanne Howard	Patchway Town Council	8.1	Burden on local services/infrastructure due to sudden change in population density and difficulties faced by small towns to mitigate this.	The purpose of the SPD is to provide further guidance to support adopted planning policies in relation to HMOs, housing diversity, residential amenity and housing standards. This will help SGC to provide homes that are needed whilst ensuring that development does not have an adverse impact on the character of the surrounding areas and adjacent properties. The SPD seeks to provide guidance on how the location of new HMOs will be considered, taking into account existing numbers of HMOs in the area, to avoid concentrations which could be harmful to local amenity.	No change to HMO SPD
200002	Suzanne Howard	Patchway Town Council	5.2	HMO short term tenants may have less investment in the small towns causing less social cohesion.		

200003	Suzanne Howard	Patchway Town Council	6.1 Table 9	HMO higher occupancy could increase noise and antisocial behaviour impacting current residents' quality of life.		
200004	Suzanne Howard	Patchway Town Council	5.2	Conversion of family homes to HMOs reduces supply of housing for families, impacting the housing market and pricing people out of their neighbourhoods.	Noted. The SPD is a guidance document supporting the adopted local planning framework. The council is committed to providing affordable homes to its residents and HMOs can be a useful contributory source of housing supply. We do not have control over the private housing market but we are committed to supporting mixed communities in all localities.	No change to HMO SPD
200005	Suzanne Howard	Patchway Town Council	6.1.a)	Landlord neglect causing visual change in property which may impact wider area and future investment	Noted. Policies; CS1, PSP8, PSP39 address the importance of developments maintaining appropriate character and visual amenity. This is the responsibility of the landlord or agent to manage unless it is clearly stated in the tenant contract, in which case the landlord is required to provide the correct equipment. If this is not taking place, reporting to the council here should be the next step.	Addition to the SPD on how to report planning breaches as there are multiple mentions of need to enforce
200006	Suzanne Howard	Patchway Town Council	6.1.e)	More occupants per house generate greater waste, if refuse storage and collection aren't scaled properly, this can lead to littering, vermin issues, and	Noted. In 2019 the council adopted the Waste and Recycling Collection: Guidance for new developments (Supplementary Planning Document). This outlines that "additional recycling containers are recommended for HMOs (free of charge) and landlords can apply for an extra capacity residual bin on behalf of their tenants. An annual administration	No change to HMO SPD

				environmental decline.	charge is applied to the extra capacity residual bin service.” The Environmental Enforcement Policy addresses how waste mismanagement is enforced and fined. Waste management is also part of licencing conditions so negligence from the landlord could impact future licence renewal. Enforcement is carried out based on the reporting of Refuse Collectors or local residents.	
200007	Suzanne Howard	Patchway Town Council	6.1.d)	Poorly managed HMOs can lead to overcrowding and substandard conditions, putting residents at risk. Small towns may lack sufficient enforcement officers to effectively inspect and regulate.	The regulation of housing standards is covered by Part 1 of the Housing Act 2004 and the management of HMOs is regulated by the Management of Houses in Multiple Occupation (England) Regulations 2006. Adherence with these requirements is monitored during the inspection of any property concerned on either a proactive or reactive basis. All large HMOs also require planning permission and PSP8 Residential Amenity Policy sets out planning policy requirements where development proposals (including conversion to an HMO) will be acceptable provided they do not create unacceptable living conditions. South Gloucestershire Council actively takes enforcement action against breaches found. Our Civil Penalty Notice (CPN) policy, which sets out how penalties are applied, is published on our website for transparency.	No change to HMO SPD
200008	Suzanne Howard	Patchway Town Council	5.2	A sudden rise in HMOs could alter the demographic balance,	The purpose of the SPD is to provide further guidance to support adopted planning policies in relation to HMOs, housing diversity, residential amenity and housing standards. This will help SGC to provide	No change to HMO SPD

				undermining Town's strong heritage identity and long-term sustainability.	homes that are needed whilst ensuring that development does not have an adverse impact on the character of the surrounding areas and adjacent properties. The SPD seeks to provide guidance on how the location of new HMOs will be considered, taking into account existing numbers of HMOs in the area, to avoid concentrations which could be harmful to local amenity.	
200009	Suzanne Howard	Patchway Town Council	Whole Document	Patchway Town Council is interested in how many homes have been changed to HMOs in Patchway over the last 10 years, and what proposals there may be for the future provision in Patchway	Noted. The Planning Service holds information on the number of HMO planning applications granted. Information on the number of HMO licences approved is held by the Private Sector Housing team.	No change to HMO SPD
210001	Kayleigh Lenney	Member of the public	5.3	HMO density threshold should be in line with national guidance where more than 10% is considered harmful	The approach set out within the SPD has been informed by a study carried out by the National HMO Lobby which considered that between 10% of properties and 20% of the population is the 'tipping point' for HMO dominance in a neighbourhood. We agreed a 10% threshold is widely accepted at neighbourhood level within similar SPDs of nearest neighbours Bristol and Bath and North East Somerset. However, there is insufficient evidence to support a more restrictive threshold within 100 metres at this time.	No change to HMO SPD
210002	Kayleigh Lenney	Member of the public	5.2	Sandwiching threshold assessment should also consider	The SPD seeks to provide guidance on how the location of new HMOs will be considered, taking into account existing numbers of HMOs in the area, to avoid concentrations which could be harmful to local	No change to HMO SPD

				neighbourhood level to look at cumulative impacts.	amenity. It also provides guidance on how good standards of accommodation can be met, including through appropriate waste management and parking provision. The threshold guidance is set at 20% within 100 metres, which is considered to be an appropriate measure to be used to assess whether localities are likely to experience harm to their character and amenity, as a result of an over concentration of HMOs.	
210003	Kayleigh Lenney	Member of the public	5.3	Mapping system should be fixed and include unlicensed HMOs before SGC approves any more.	Due to the HMO licensing requirements, where only large HMOs are required to have a mandatory licence, it is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a register of small HMOs. Moreover, it should also be noted that the 3 and 4 people HMO's are much more akin to a normal family house and there will be plenty of rented and owner occupied single family houses with more occupants, especially with the current housing market with extended families living together. When the new map goes live any small sites granted planning permission since January 2024 (i.e. since the A4Ds came into effect) will be shown. Small sites (which are not licensed) in operation before 2024 will continue not be shown as explained above.	No change to HMO SPD
210004	Kayleigh Lenney	Member of the public	6.1.f)	Require one car parking space and secure bike storage per bedroom	Noted. HMOs can have an increased number of adults compared to family homes however evidence for the assumption that every resident will need a car cannot be found. Increasing the number of car parking spaces needed could encourage more car ownership rather than relieve the problem of insufficient car parking spaces. Policies, Sites and	No change to HMO SPD

					Places DPD (2017) Policy PSP16 (Parking Standards) sets out comprehensive development plan policy requirements for the amount of car and cycle parking spaces required in proposed new development.	
210005	Kayleigh Lenney	Member of the public	6.1.g)	Encourage HMO specific planning layouts to avoid conflicts with neighbours such as avoid placing communal areas opposite other residences' communal areas, bin storage facilities and prevention of garages being used as communal living spaces.	The Council has a number of adopted planning policies that are used to ensure appropriate residential design quality is achieved in new developments. With regard to HMO planning applications policy PSP8 Residential Amenity sets out planning policy requirements. Guidance in the SPD in Table 9 explains how to interpret PSP8 to avoid noise impact on neighbouring properties. In 2019 the council adopted the Waste and Recycling Collection: Guidance for new developments (Supplementary Planning Document). The SPD highlights the need for sufficient, accessible and discrete bin storage as it is required by the National Planning Policy for Waste (NPPW).	No change to HMO SPD
210006	Kayleigh Lenney	Member of the public	5.3	More detailed and clearer guidance needed on how density thresholds are applied and have all sizes of HMO included.	Noted. The SPD explains the difference between small and large HMOs and the planning policy provisions that apply to each. Due to the HMO licensing requirements, only large HMOs are required to have a mandatory licence. It is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a register of small HMOs. The thresholds are calculated based on the data we have, as small HMOs have not been found to cause the same level of harm as they are generally considered to be more akin to family housing.	No change to HMO SPD

210007	Kayleigh Lenney	Member of the public	6.1.e)	Include mandatory additional bins and develop stricter policies on waste management and enforcements if waste is not cleared.	<p>Noted.</p> <p>In 2019 the council adopted the Waste and Recycling Collection: Guidance for new developments (Supplementary Planning Document). This outlines that “additional recycling containers are recommended for HMOs (free of charge) and landlords can apply for an extra capacity residual bin on behalf of their tenants. An annual administration charge is applied to the extra capacity residual bin service.”</p> <p>The Environmental Enforcement Policy addresses how waste mismanagement is enforced and fined. Waste management is also part of licencing conditions so negligence from the landlord could impact future licence renewal. Enforcement is carried out based on the reporting of Refuse Collectors or local residents.</p>	No change to HMO SPD
220001	Barbara Badger	Member of the public	5.2/5.3	Despite many objections and community highlighting incorrect number of HMOs the Council approved an HMO in Colts Ground.	<p>Noted.</p> <p>Colts Ground is in an Article 4 Direction Area so any HMO in that area would require a planning application. Every planning decision involves the consideration of the issues for and against the proposed development, what is often referred to as the planning balance or balancing of the planning issues. This consideration is undertaken using a set of rules – set nationally by legislation and Government guidance and also through the council’s own local planning policies – which we apply through our Local Plan.</p> <p>Further details about the planning application determination can be found in the application decision letter on the planning portal.</p>	No change to HMO SPD

220002	Barbara Badger	Member of the public	5.3	SPD should reflect national guidance of 10% concentration of HMOs being considered harmful.	The approach set out within the SPD has been informed by a study carried out by the National HMO Lobby which considered that between 10% of properties and 20% of the population is the 'tipping point' for HMO dominance in a neighbourhood. We agreed a 10% threshold is widely accepted at neighbourhood level within similar SPDs of nearest neighbours Bristol and Bath and North East Somerset. However, there is insufficient evidence to support a more restrictive threshold within 100 metres at this time.	No change to HMO SPD
220003	Barbara Badger	Member of the public	5.3	Need a Broader Impact Assessment accounting for the cumulative impact.	As outlined in the SPD, the threshold is set at 20% within 100 metres. In A4D areas all HMOs will need planning permission so the cumulative impact in the area will be considered.	No change to HMO SPD
220004	Barbara Badger	Member of the public	5.2/5.3	Council records show a disinterest in rectifying record of HMOs in Stoke Park and Cheswick. Approval of new HMOs without a fixed map system with small HMOs included calls into question the Threshold calculation.	Noted. Due to the HMO licensing requirements, only large HMOs are required to have a mandatory licence. It is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a register of small HMOs. The thresholds are calculated based on the data we have, as small HMOs have not been found to cause the same level of harm.	No change to HMO SPD
220005	Barbara Badger	Member of the public	6.1.f)	Require parking minimum provision of one space per bedroom.	Noted. HMOs can have an increased number of adults compared to family homes however evidence for the assumption that every resident will need a car cannot be found. Increasing the number of car parking spaces needed could encourage more car	No change to HMO SPD

					ownership rather than relieve the problem of insufficient car parking spaces. Policies, Sites and Places DPD (2017) Policy PSP16 (Parking Standards) sets out comprehensive development plan policy requirements for the amount of car and cycle parking spaces required in proposed new development.	
220006	Barbara Badger	Member of the public	6.1.g) and e)	Prevent garages being used as communal areas and factor in bin storage.	Noted. Bin storage is included in the HMO SPD and the Waste and Recycling Collection: Guidance for new developments (SPD) as guidance for the Core Strategy Policy 1 see table 7 in section 6.1.	No change to HMO SPD
220007	Barbara Badger	Member of the public	5.2/5.3	Improve your planning guidance to include all HMOs not just large ones.	The SPD explains the difference between small and large HMOs and the planning policy provisions that apply to each. Due to the HMO licensing requirements, only large HMOs are required to have a mandatory licence. It is not possible for all HMOs to be recorded across South Gloucestershire as there is no legal reason or requirement for SGC to hold a register of small HMOs. The thresholds are calculated based on the data we have, as small HMOs have not been found to cause the same level of harm as they are generally considered to be more akin to family housing.	No change to HMO SPD
220008	Barbara Badger	Member of the public	6.1.e)	Improve waste management with stricter policies and enforcement if waste is not cleared.	Noted. In 2019 the council adopted the Waste and Recycling Collection: Guidance for new developments (Supplementary Planning Document) . This outlines that “additional recycling containers are recommended for HMOs (free of charge) and landlords can apply for an extra capacity residual bin on behalf of their tenants. An annual administration	No change to HMO SPD

					charge is applied to the extra capacity residual bin service.” The Environmental Enforcement Policy addresses how waste mismanagement is enforced and fined. Waste management is also part of licencing conditions so negligence from the landlord could impact future licence renewal. Enforcement is carried out based on the reporting of Refuse Collectors or residents.	
220009	Barbara Badger	Member of the public	5.2	Council is ineffective at protecting community from adverse effects of HMOs.	Noted. The Council acknowledges concerns regarding the perceived effectiveness of measures to protect communities from the impacts of HMOs. The HMO SPD is designed to provide clear guidance to support adopted planning policies, including Policy PSP39 (Houses in Multiple Occupation) and Policy PSP8 (Residential Amenity). These policies aim to ensure that HMO development does not result in unacceptable impacts on local amenity, such as noise, waste, or parking issues. Complaints about HMOs are fully investigated in partnership between the Waste Enforcement Team and the Private Sector Housing Team. If issues are identified these are usually dealt with informally in the first instance, and if they persist using powers under the Anti-social Behaviour, Crime and Policing Act 2014.	No change to HMO SPD
220010	Barbara Badger	Member of the public	Whole document	Suggestion council not interested in limiting HMOs in area and implication that	Noted. The Council works closely with UWE and maintains regular liaison in relation to the impact of HMOs within the local environs of UWE. UWE is also a key consultee/ stakeholder and works proactively	No change to HMO SPD

				UWE could be a reason why.	with the Council and our partners in recognition that UWE is now integrated into a wider suburban context and serves as a hub for the local community around it. As UWE brings forward proposals to develop its campus with more on-site purpose-built student accommodation this will help to potentially reduce the demand for students to live off campus.	
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