

Article 4 Direction Summary of Consultation Comments and Council Responses

	Summarised Consultation Comment	Council Response
	<u>Consultation Responses in Support</u>	
	<i>Comments on the Article 4 Direction</i>	
1	HMOs are not suitable in residential areas	National Policy clearly considers that HMOs are a type of residential use and are acceptable in residential areas. The Council also considers that HMOs are suitable in residential areas subject to certain considerations, but that where there are concentrations, each case must be judged on its own merits.
2	Too many properties are being converted to HMOs. Something has to be done to tackle the significant rise in HMOs	We have identified that some areas are experiencing high concentrations of HMOs. The A4D can help to control further changes, and also protect other areas from experiencing over concentrations.
3	More control over landlords is required.	Planning legislation is not able to exercise control over landlords. However, control over harmful concentrations of HMOs could be beneficial.
4	Mutley & Greenbank have been altered beyond recognition by the increase in HMOs	Noted – issues relating to the Council’s approach to resulting planning applications will be dealt with in future planning guidance should the A4D be confirmed.
5	Concern that if this activity is not curbed it will continue to degrade the area (Peverell)	Noted – issues relating to the Council’s approach to resulting planning applications will be dealt with in future planning guidance should the A4D be confirmed.
6	The following issues with HMO properties were identified: <ul style="list-style-type: none"> - Tenants often create excess anti-social behaviour, noise and nuisance 	The potential issues with regard to individual and concentrations of HMO properties and their occupants are noted.

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	<ul style="list-style-type: none"> - Additional parking problems and pressures. - Increases in crime rate. - Increases in litter. - Loss of identity of areas with high concentrations of HMOs leading to unbalanced and unsustainable communities. - Impact to the physical environment and streetscape. - Growth in the private rented sector at the expense of owner-occupation - Resulting pressure on local community facilities - Household waste increases - Inadequate waste storage facilities - Vermin infestation 	<p>The A4D is not considered to be an answer to these issues on its own but can form part of a suit of measures and approaches to combat issues within the City.</p>
7	<p>Occupation of Student properties is only during term time meaning that properties are uncared for and empty for 3 months. This also results in lack of neighbourhood cohesion due to transient populations.</p>	<p>The Council considers that high concentrations of HMO properties can cause issues due to transience, and that is one reason in support of an A4D in order to exercise control over future numbers. However, HMOs form an important part of Plymouth's housing stock with their occupants bringing benefits to the City.</p>
8	<p>Loss of family housing will be detrimental to local facilities such as schools and local shops.</p>	<p>Loss of family housing can lead to reduced demand for local school places from families within the neighbourhood and this can lead to less sustainable neighbourhoods.</p> <p>Evidence suggests that local student populations often support local shops.</p>

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9	An Increase in HMOs is leading to a reduction in house price in areas where HMOs are known to be.	Impacts to house prices is not a material planning consideration.
10	An A4D would benefit communities if the Council is able to be involved in the development of HMOs because they can be a contact point for problems.	An A4D would allow public involvement in the consideration of applications for HMOs and this is welcomed. The Council already acts as a contact point for issues relating to HMOs which are dealt with by the appropriate Council service.
11	The A4D would prevent houses in an unsuitable environment, such as those in a small cul-de-sac with families, being converted into HMOs.	The fact that a property is in a cul-de-sac is in itself not a reason to resist a change to a HMO. Issues relating to the Council's approach to resulting planning applications will be dealt with in future planning guidance should the A4D be confirmed.
12	The A4D, if effectively managed, could halt any further proliferation of poorly managed concentrated HMO housing spreading to wider areas of the city.	Partially agree – the A4D will be able to refuse changes of use to C4 HMO use where it is appropriate to do so, including the prevention of harmful concentrations within the City. Management of HMOs is not a planning matter but could be an issue for the Council's Housing Department. Issues relating to the Council's approach to resulting planning applications will be dealt with in future planning guidance should the A4D be confirmed.
13	The A4D allows local people to have a say in the way that their area develops when planning applications are received for HMOs.	Agree.
14	The Direction does little to tackle the problem in areas where the concentration is already beyond threshold capacity.	Partially agree – the A4D does not apply retrospectively; however, depending on the policy approach of the Council and other factors, existing concentrations could reduce over time.

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15	Mutley & Greenbank is already an unsustainable community with too low a proportion of families; however, the A4D is better late than never. It would be good to control further planning applications.	Noted.
16	The Direction should come into effect before September 2012.	Disagree - Bringing into effect an A4D prior to September 2012 would risk substantial compensation claims being made against the Council if planning applications for C4 HMO use are refused.
17	The A4D should have been made a long time before now.	Noted - The permitted development rights for changes of use from C3 to C4 were introduced in November 2010. This A4D would not have been possible prior to that date.
18	The A4D is too little too late.	Noted – changes to use classes order occurred in April 2010. Prior to that date no control over C4 HMOs was possible.
	<i>Comments on the Article 4 Area Proposed</i>	
19	The area may need to be extended in the future but includes most of current hot spots.	Noted - the A4D will be subject of a review after 12 months, if it is confirmed.
20	The whole of the city should be included.	Disagree – there is not considered to be sufficient evidence to justify a city wide A4D in areas at significant distance from existing concentrations of HMOs
21	Question the need to include the four northern neighbourhoods currently covered by the A4D where student numbers are not large enough and there will be an associated increase in workload.	Noted – these areas are included to ensure that latent demand for HMO housing is not merely located immediately adjacent to existing high concentration areas. The current A4D area is considered to be appropriate. The A4D will be subject of a review after 12 months if it is confirmed.

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22	St Judes should be included within the A4D area.	Agree – St Judes is already included
23	Important to protect the surrounding neighbourhoods to Mutley and Greenbank	Agree – The surrounding neighbourhoods to Mutley and Greenbank are already included in the A4D area. Issues relating to the Council's approach to resulting planning applications will be dealt with in future planning guidance should the A4D be confirmed.
	<i>Other Comments Received</i>	
24	What can be done with HMOs that have already been established?	With regard to planning powers, the A4D will not apply retrospectively to established HMOs. If HMOs convert to C3 'family' dwellings then, should the A4D be confirmed, planning permission will be required to convert them back to C4 use.
25	How will the likely influx of landlords converting properties into HMOs prior to the A4D coming into force be managed?	National Legislation allows this, and there is no tool available for the Local Planning Authority to prevent changes of use to C4 HMOs during the 12 month notification of a non-immediate Article 4 Direction before it comes into force. Any increase in applications for licensing or parking permits will be managed by the respective Council services and other legislation will continue to apply as normal.
26	Will the A4D be supported by a prescribed ceiling on the number of HMOs in any given area? Will permission for further HMOs in saturated areas be refused?	Issues relating to the Council's approach to resulting planning applications will be dealt with in future planning guidance to be published for consultation in 2012 should the A4D be confirmed. Planning applications will be determined on a case by case basis on their merits.
27	Concerns raised regarding the successful use of planning enforcement powers to support the A4D including	Where specific cases are brought to Planning Services' attention they are investigated and enforcement action

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	penalties for non-compliance and automatic refusal for retrospective applications.	is taken where it is expedient to do so. Penalties for non-compliance with enforcement notices are dealt with through the planning legislation. It is not possible under current planning law to refuse retrospective applications solely on the basis that they are retrospective.
28	Concern that future applications will simply be rubber stamped and that this is just an income generating exercise.	Each planning application is judged on its own merits. The A4D is not an income generating exercise – planning applications received as a result of the removal of permitted development rights by an A4D do not attract a fee under the current, national, fee regime.
29	The concentration of HMOs should be measured locally on a street by street basis to ensure that the level of HMOs does not rise uncontrolled in a street despite a 'neighbourhood' as a whole being at a lower level.	Noted – issues relating to the Council's approach to resulting planning applications will be dealt with in future planning guidance to be published for consultation in 2012 should the A4D be confirmed.
	The Council should consider:	
30	- Additional Licensing	The main aim of licensing is to protect tenants by ensuring that there are adequate facilities for the number of occupiers and that the house is properly managed in terms of safety, refuse disposal etc. 'Selective Licensing' is a control aimed at areas of 'low demand' or where properties are being neglected as a result of anti-social behaviour and is not considered to be appropriate for Plymouth. The need for 'Additional Licensing' is currently under consideration. These measures are being considered as part of the developing Housing Strategy.

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31	<ul style="list-style-type: none"> - A Landlord Accreditation Scheme 	<p>The Council is currently running landlord accreditation training days and landlords can also become accredited on-line. Accredited landlords receive a discount on their licence fee. We are promoting landlord accreditation through the forum we have with landlords and links with landlord associations. Furthermore, the University already run a Landlord Accreditation Scheme.</p>
32	<ul style="list-style-type: none"> - Neighbourhood Help lines 	<p>We are not aware of any power that is available to the Council to require a telephone helpline number to be supplied by Landlords. We do encourage landlords to let neighbours know who to contact. Furthermore, there are a number of channels that complaints can be directed including Planning Services, Public Protection, Housing, the Anti Social Behaviour Team and the Police depending on the nature of the concern.</p>
33	<ul style="list-style-type: none"> - Organising Peverell neighbourhood meetings 	<p>Neighbourhood meetings are organised by neighbourhood liaison officers in partnership with local policing teams and can be useful events to share and address specific issues and best practice within neighbourhoods.</p>
34	<ul style="list-style-type: none"> - Use of untidy Site Notices 	<p>We already serve untidy site notices on properties where it is expedient to do so. Members of the public can write to the Planning Department if they are concerned with a particular property. We will then investigate the matter and take action where appropriate.</p>
35	<ul style="list-style-type: none"> - Removal of Letting Boards 	<p>Letting boards are covered by the control of advertisement regulations 2007. Class 3A of those</p>

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		regulations give deemed consent for letting boards to be displayed subject to certain conditions. Members of the public can write to the Planning Department if they wish to bring a particular advertisement to our attention. We will then investigate the matter and take action where appropriate.
36	- Proactive partnership with Key stakeholders	The Council welcomes partnership working with, and between, service providers and already work closely with these groups. This is done through the private rented forum and through the annual landlords EXPO, also by giving talks at landlord associations providing information in the form of leaflets, a landlords manual, and comprehensive information on our website. A specific task group has been created within the Council to further improve proactive and collaborative measures in relation to Houses in Multiple Occupation.
37	Refusal to re-issue a license should occur where problems arise.	The licensing regime sits outside of the planning framework. This comment has been passed to our housing team for consideration.
38	There is a huge need for a parking permit policy and not allowing more than a set number according to the ratio or spaces to permits.	Parking restrictions and permits sit outside of the planning framework. This comment has been passed to our transport team for consideration.
39	All of the houses are covered with a covenant requiring them to be used as family use only.	Private covenants are not material planning considerations and have no bearing on the consideration of planning applications or the use of an A4D.
40	Too many landlords do not have good tenancy agreements that mention noise or refuse control and	Tenancy agreements are a private matter between landlords and their tenants. The Council has powers to

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	landlords fail to monitor the impact of their tenants on the neighbours.	deal with unacceptable behaviour where necessary.
41	The Council should have a list of Landlords.	There is no provision or requirement for local authorities to have a complete list of landlords. The Housing department hold details of those landlords who require a licence.
42	Empty business buildings in the City Centre should be converted to student accommodation.	The adopted City Centre and University Area Action Plan seeks to create a better mix of uses in the centre which are compatible with its retail function. This would include residential and student accommodation.
43	Council tax should be payable by HMO owners (Student houses are currently exempt)	The Council does not currently have the power to levy a Council Tax charge on student exempt properties. Such a charge would require changes to legislation at a National level.
	<u>Consultation Responses in Objection</u>	
	<i>Comments on the Direction</i>	
44	The National Landlords Association believes that any additional regulation of the private and rented sector should balance the desire to ensure secure and sustainable communities with the increasing need for good quality housing.	Agree.
45	Additional restrictions should focus on engaging with private landlords through partnership working to improve standards and reducing opportunities for rogue landlords. Good practice should be encouraged in addition to enforcement activity.	Partially agree – partnership working and good practice in addition to enforcement activity should be encouraged but this does not preclude the use of an A4D to allow control of concentrations of HMOs. The positive approaches mentioned would not prevent further changes of use and resulting over

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		concentrations.
46	The Council are trying to claim that there is a problem with HMOs, which there isn't.	Disagree – Evidence suggests that over concentrations of HMOs can lead to unsustainable neighbourhoods.
47	The use of the legislation is based on nimby thinking and a judgemental view of younger/poorer people.	Disagree – The use of the A4D is based on an evidenced damage to the sustainability of communities created by over concentrations of HMOs.
48	Students have a positive influence on local areas including supporting local shops.	Agree.
49	A reduction in available HMOs will lead to a decline in Plymouth University's attractiveness and young people will choose other cities, running the risk of diminishing the raised profile of Plymouth.	Although an insufficient supply of student HMOs could result in the issue identified, we consider that the A4D is unlikely to result in a significant loss of existing HMO housing stock. The A4D itself does not mean that all further planning applications for HMOs will be refused. Furthermore, many other University cities are also using A4D powers.
50	The use of an A4D will not solve the problem it is supposed to address.	Partially Agree – The A4D will not solve all of the problems that some people think that it will, including immediate solutions to issues, perceived and real, with existing HMOs; however, it will help to address the problem that the Council has identified, namely future growth in areas creating over concentrations of HMOs.
51	The legislation will have no effect in areas of existing high concentration because the A4D is not retrospective.	Partially agree – the A4D does not apply retrospectively; however, depending on the policy approach of the Council, existing concentrations could reduce over time.
52	Problems are caused by the occupants of HMOs (and not	Planning powers are not able to control an individual's

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	the HMOs themselves) as a result of society being able to control and correct unacceptable or anti-social behaviour.	behaviour, but this is only part of the problem as high concentrations of HMOs are damaging to Community Cohesion and other impacts on local infrastructure etc.
53	<p>Where particular cases of unacceptable behaviour are identified, issues relating to concentrations of shared housing can be solved using other existing statutory powers such as:</p> <ul style="list-style-type: none"> - Anti-Social Behaviour Orders - Injunctions under the Housing Act 1996 or Local Government Act 1972 - Directions regarding the disposal of waste - Litter abatement notices under section 92 of the Environmental Protection Act 1990 - Powers under the Noise Act 1996 to serve fixed penalty notices or remove electrical equipment. - The power to require rubbish to be removed from land under the Prevention of Damage by Pests Act 1949. 	Available statutory powers are used by the Council where appropriate. The A4D is considered to compliment the enforcement of other legislation and can provide an important tool for the management of HMOs, specifically with regard to concentrations of HMOs.
54	There is already sufficient legislation in place, perhaps the will and funds are missing to enforce the legislation?	Changes have been made to national planning legislation to allow Local Authorities to exercise control where it considers it expedient too do so. An A4D would allow the proactive prevention of harmful HMO concentrations where appropriate.
55	Most often, improper management of HMOs is due to ignorance rather than roguish intent. Assisting landlords to develop the required knowledge and skills to improve identified issues is a more appropriate response to the use of an A4D.	Partially Agree – educating landlords is an important method of improving the management of HMOs and this approach is considered to be complimentary to the use of an A4D.

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56	Where individual cases exist that this approach is unsuccessful, the issues would not be appropriately tackled by an A4D. Enforcement Notices and Management Orders should be considered.	In individual cases Enforcement Notices and Management Orders could be appropriate. The use of an A4D is considered to be complimentary to these tools.
57	Accreditation is considered to be a more efficient tool than A4D for professionalising the private rented sector.	The Council is currently running landlord accreditation training days and landlords can also become accredited on-line. We are promoting landlord accreditation through the forum we have with landlords and links with landlord associations. Furthermore, the University already run a Landlord Accreditation Scheme. An A4D is considered to be complimentary to these tools.
58	Improving housing relationships with local universities is another solution.	An A4D is considered to be complimentary to this approach.
59	The biggest perceived problem of studentification is that of drunken behaviour, which is a matter of policing. Often the culprits are actually from other local 'lads', sports teams or 'down-and-outs'.	Planning powers are not able to control an individual's behaviour, but this is only part of the problem as high concentrations of HMOs are damaging to Community Cohesion and other impacts on local infrastructure etc.
60	Drunken behaviour is a result of too many bars on Mutley Plain.	Planning powers are not able to control an individual's behaviour, but this is only part of the problem as high concentrations of HMOs are damaging to Community Cohesion and other impacts on local infrastructure etc.
61	By spreading out HMOs you will increase the problem because drunks will have to walk longer distances and will therefore cause more trouble.	Planning powers are not able to control an individual's behaviour, but this is only part of the problem as high concentrations of HMOs are damaging to Community Cohesion and other impacts on local infrastructure etc.
62	Future demand is likely to increase for HMOs which provide important flexibility and affordability in	It is accepted that HMOs form a valuable element of the housing supply. The making of an A4D is not a blanket

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	Plymouth's housing stock for occupants such as young professionals, students and migrants. The characteristic between these groups is that they are necessarily transient.	ban on future changes of use to HMOs. In addition, the Direction does not currently cover the whole of the city.
63	Furthermore, changes to the Local Housing Allowance which took effect this April will further increase the need for shared accommodation in the City. Limiting the number of HMOs is highly likely to have a significant and long-lasting effect on the provision of good quality, affordable accommodation.	It is accepted that HMOs form a valuable element of the housing supply. The making of an A4D is not a blanket ban on future changes of use to HMOs. In addition, the Direction does not currently cover the whole of the city.
64	Tenants in shared accommodation do not want to live in the suburbs with outlying properties also being too expensive.	It is accepted that HMOs form a valuable element of the housing supply. The making of an A4D is not a blanket ban on future changes of use to HMOs.
65	The Council are too involved in these matters that should be left to the supply and demand of market forces.	Planning controls were introduced to limit market forces, in the wider interests of society. The making of an A4D is not a blanket ban on future changes of use to HMOs. In addition, the Direction does not currently cover the whole of the city.
66	The Council is very down on the private rented sector and would rather see purpose built student accommodation against the wishes of students. The proposal creates an un-level playing field for smaller landlords compared to student halls' companies.	The Council is supportive of purpose built student accommodation to provide for the demand for this type of housing that has been shown to be preferred by first year students.
67	The proposals create a false market between family and small HMO properties.	The effect on house prices is not a material planning consideration. Furthermore, the A4D will not restrict all future applications for HMO properties.
68	The A4D will discourage HMOs from being used as family letting.	It is agreed that landlords may choose to retain a property in HMO use in preference of letting to a family

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		to ensure that the established use is retained. However, we would expect that properties will continue to be converted to 'family letting' in some circumstances.
69	The A4D, and resulting requirement to apply for planning permission, will deter future landlords from applying for and providing HMO housing.	Although a planning application can be seen as a disincentive to apply for HMO housing, the Council does not consider that it will deter most prospective landowners.
70	Private rented HMOs are flexible forms of housing type satisfying demand in the areas needed. The proposed Article 4 Direction will remove this flexibility.	The A4D will reduce the flexibility of properties; however, planning applications will not necessarily be refused and consideration will be given to the provision of HMO type dwellings.
71	In light of the current economic climate, the last thing good Landlords need is to be further penalised by new regulations; particularly where there appears to be limited direct and immediate benefit to landlords or tenants.	Unfortunately, it is not possible to differentiate between good and bad landlords. In any event the principle of an A4D is not to control individual landlords or properties, but to consider the cumulative effect of HMOs on communities.
72	The resulting additional cost of A4D will inevitably tend to push up rents.	Effects on property prices and rental levels are not material planning considerations.
73	The A4D will result in a reduction in house prices and potential rental rates for family housing.	Effects on property prices and rental levels are not material planning considerations.
74	It will be difficult to rent out or sell properties in areas of high concentrations of students to families.	We consider that the majority of properties will be rentable or saleable to families. Nonetheless, the A4D does not mean that all future planning applications will be refused and each will be judged on its own merits. Issues relating to the Council's approach to resulting planning applications will be dealt with in future planning guidance should the A4D be confirmed.

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75	The A4D will remove individual's private rights, with no compensation, and the ability to let a property to students in the future as part of a long term plan.	The A4D and compensation legislation is created at a national level, and is considered to be appropriate.
76	Private individuals are being penalised to solve a problem others created and others benefit from.	The A4D is intended to benefit the wider community by promoting sustainable neighbourhoods with mixed communities.
77	The options available to those that are restricted by an A4D are limited – either sell or convert the property prior to the A4D coming into effect.	If someone is considering the change of use of a dwelling to a HMO within the area of an A4D there is also the option of submitting a planning application.
78	The use of an A4D against the spirit of current Tory policy to reduce planning interference.	The current situation with regard to HMOs is a result of changes made by the Coalition Government. The ability to apply locally appropriate measures is clearly in line with the Government's localism agenda. Furthermore, the A4D is in accordance with the Government's emerging national policies and the presumption in favour of sustainable development.
79	The Control of additional HMOs is supported, but the trigger of 3 occupants [created by the A4D] is too low – 6 would be more appropriate.	Disagree – In concentrations, C4 HMOs with 3 or more occupants can have harmful impacts on the sustainability of neighbourhoods.
	<i>Comments on the Proposed Area</i>	
80	The proposed area of nearly the whole of Plymouth city is unnecessary.	Disagree – We consider, on balance, that the A4D is a useful tool to prevent future over concentrations of HMOs.
81	No area in Plymouth needs this legislation	Disagree – We consider, on balance, that the A4D is a

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		useful tool to prevent future over concentrations of HMOs.
	<i>Other Associated Comments</i>	
82	The A4D should not be used as a check-box exercise by local authorities to identify landlords operating in their area.	There is no link between an A4D, and to owners of properties. We would, however, welcome approaches by responsible landlords to advise the authority which properties are in multiple occupation.
83	Should an A4D be established, the information gained should be used to further engage with landlords.	There is no link between an A4D, and to owners of properties. We would, however, welcome approaches by responsible landlords to advise the authority which properties are in multiple occupation.
84	Considered to be limited opposition to HMOs other than by residents associations without concern for the multitude of people wanting shared accommodation.	There are competing views on the use of an A4D but this consultation has shown that those in support include property owners in addition to resident's associations. The Direction does not mean that all planning applications for HMOs will be refused.
85	Do not consider that enough consultation period [sic] has been allowed for this matter to be considered effectively by the 'public at large'.	Disagree – the timescales of the consultation were in accordance with our customer charter and the methods of consultation were conducted in excess of statutory requirements, including press coverage, press notice, publication on our website, site notices throughout the affected neighbourhoods, newsletter and notification through our consultation portal.
86	Consider that the method of consultation has been ineffective in respect of unclear information and misinterpretation of the type and scope of the consultation.	Disagree – the timescales of the consultation were in accordance with our customer charter and the methods of consultation were conducted in excess of statutory requirements, including press coverage, press notice,

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		publication on our website, site notices throughout the affected neighbourhoods, newsletter and notification through our consultation portal.
87	Request an extended consultation period.	The six week period of consultation was in accordance with PCC's Statement of Community Involvement and the consultation period required by Statute. The period was also agreed by Cabinet.
88	Request a review of the decision not to extend the consultation period.	The six week period of consultation was in accordance with PCC's Statement of Community Involvement and the consultation period required by Statute. The period was also agreed by Cabinet.
89	Why have two nearby large developments (30 and 15 bedspaces, Mutley) been recently approved?	An A4D is not a blanket ban. It enables planning control to be exercised and each case to be dealt with on its merits.
90	Consider that changes of use to 'C4' use class do not represent a substantial change of use in terms of the burden imposed on local infrastructure and do not require planning permission. Therefore there is not sufficient justification to introduce demarcation into the housing stock for the purpose of controlling the legitimate use of a property.	Whether or not a change in occupation is considered to be a change of use is a matter of fact and degree, and is determined on a case by case basis in light of precedent and case law. Nonetheless, planning permission is only required where a change of use occurs irrespective of the existence of an A4D.
91	The Council has not viewed all of the HMOs in the city and should [instead of making an A4D] concentrate on rogue landlords.	These approaches are not mutually exclusive. There is considered to be a need to address both issues of over concentration of HMOs and 'rogue landlords'.
92	Time would be better spent getting buildings that are run down and empty back on the market.	The A4D can prevent over concentrations of HMOs and is complimentary to bringing empty homes into use. Dealing with long term vacancies is being addressed by the Housing Department.

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93	Consider that the proposal is purely a revenue raising exercise for the Council.	The A4D is not an income generating exercise – planning applications received as a result of the removal of permitted development rights by an A4D do not attract a fee under the current, national, fee regime.
	<i>Westcountry Landlords Association</i>	
	<i>'The objects [sic] from Westcountry Landlords Association and some of our members are:</i>	
94	<i>Make it difficult for all groups of 3 or more sharing a house to live together including post graduates, nurses/doctors and all key workers in the city.</i>	It is accepted that HMOs form a valuable element of the housing supply. The A4D does not apply retrospectively. The making of an A4D is not a blanket ban on future changes of use to HMOs. In addition, the Direction does not currently cover the whole of the city.
95	<i>Cause the value of owner occupied properties to fall up to 40% in some parts on the City</i>	Impacts to house prices are not a material planning consideration.
96	<i>Have a huge impact on low earners</i>	It is accepted that HMOs form a valuable element of the housing supply. The A4D does not apply retrospectively. The making of an A4D is not a blanket ban on future changes of use to HMOs. In addition, the Direction does not currently cover the whole of the city.
97	<i>Have a huge impact on the young unemployed</i>	It is accepted that HMOs form a valuable element of the housing supply. The A4D does not apply retrospectively. The making of an A4D is not a blanket ban on future changes of use to HMOs. In addition, the Direction does not currently cover the whole of the city.

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98	<i>Impossible for letting agents to rent property make [sic] it difficult and in some cases impossible to sell investment properties</i>	If someone is considering the change of use of a dwelling to a HMO within the area of an A4D there is also the option of submitting a planning application.
99	<i>Will force students and other tenants into other parts of the city</i>	The A4D will not act retrospectively to diminish the existing number of HMOs in existing areas of concentration, and further growth in some of these areas may be possible but with planning permission. It is also accepted that further HMOs could be more widely dispersed. Issues relating to the Council's approach to resulting planning applications will be dealt with in future planning guidance should the A4D be confirmed.
100	<i>Encourage landlords to operate under the radar</i>	There is no encouragement for any form of unauthorised development. Breaches of planning control will be investigated and enforcement action taken if appropriate.
101	<i>Do nothing to rebalance communities</i>	Partially agree – the A4D does not apply retrospectively; however, depending on the policy approach of the Council, existing concentrations could reduce over time. The Direction can help to prevent further areas from becoming over concentrated.
102	<i>Do nothing to address the problems created by high concentrations of HMO's</i>	It is accepted that there is no retrospective intervention. The Direction can help to prevent further areas from becoming over concentrated.
103	<i>Put a huge strain on the local planning department at a time when cuts are having a huge impact currently</i>	The exact impact on work load will be monitored and reviewed after 12 months. However, this is not considered to be sufficient reason not to take any action.
104	<i>Have financial implications for the council. The money</i>	The exact impact on work load will be monitored and

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	<i>could be spent on targeting rogue landlords.'</i>	reviewed after 12 months. However, this is not considered to be sufficient reason not to take any action.
	<u>Other Responses</u>	
105	The Theatres Trust and Network Rail thanked the authority for consulting them but did not provide any specific comments about the Article 4 Direction.	Noted.