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# Contents

<table>
<thead>
<tr>
<th></th>
<th>Introduction</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Introduction</td>
<td>1</td>
</tr>
<tr>
<td>1.1</td>
<td>Scope</td>
<td>1</td>
</tr>
<tr>
<td>1.2</td>
<td>Studentification</td>
<td>1</td>
</tr>
<tr>
<td>1.3</td>
<td>Planning Legislation for Homes in Multiple Occupation (HMOs)</td>
<td>4</td>
</tr>
<tr>
<td>1.4</td>
<td>HMO Licensing</td>
<td>6</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Higher Education in Plymouth</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Higher Education in Plymouth</td>
<td>8</td>
</tr>
<tr>
<td>2.1</td>
<td>The University of Plymouth</td>
<td>8</td>
</tr>
<tr>
<td>2.2</td>
<td>The University College of St Mark and St John (Marjon)</td>
<td>9</td>
</tr>
<tr>
<td>2.3</td>
<td>City College Plymouth</td>
<td>9</td>
</tr>
<tr>
<td>2.4</td>
<td>Plymouth College of Art</td>
<td>10</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Student Housing Distribution</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>Student Housing Distribution</td>
<td>11</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Impacts and Issues in Plymouth</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>Impacts and Issues in Plymouth</td>
<td>14</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Options for Intervention</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Options for Intervention</td>
<td>15</td>
</tr>
<tr>
<td>5.1</td>
<td>Planning Policy Options</td>
<td>15</td>
</tr>
<tr>
<td>5.2</td>
<td>Policy Option 3: Encouragement of Purpose-Built Accommodation</td>
<td>25</td>
</tr>
<tr>
<td>5.3</td>
<td>HMO Licensing</td>
<td>27</td>
</tr>
<tr>
<td>5.4</td>
<td>Management Measures</td>
<td>30</td>
</tr>
<tr>
<td>5.5</td>
<td>A Joined-up Approach</td>
<td>37</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Recommendations and Conclusions</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>Recommendations and Conclusions</td>
<td>39</td>
</tr>
<tr>
<td>6.1</td>
<td>Planning Policy</td>
<td>39</td>
</tr>
<tr>
<td>6.2</td>
<td>Licensing</td>
<td>41</td>
</tr>
<tr>
<td>6.3</td>
<td>Management Interventions</td>
<td>41</td>
</tr>
</tbody>
</table>
1 Introduction

1.1 Scope

Arup was commissioned by Plymouth City Council in July 2010 to help develop a better understanding of the impact that student accommodation (in particular, students living in Houses in Multiple Occupation (HMOs)) has on the quality of life and character of local communities. This will enable the Council to carefully manage competing land use demands and develop clear management policies for student housing. It is to act as an evidence base, to assist in the preparation of the neighbourhood statements for the Sustainable Neighbourhood’s DPD.

The scope of this research has been to focus primarily on the effects of student housing in those neighbourhoods of Plymouth where there are particular concentrations of student activity. However, it may be that some of the interventions identified would be more appropriate as broader management policies for all types of HMO households, across the local authority area.

The research recognises the specific roles that the City Council, the Higher Education Institutions (HEIs), landlords and local community groups play, both collectively and individually, in managing the positive and negative effects of concentrations of student activity within the City. The research identifies a suite of options for intervention including planning policy, licensing of HMOs and a range of HEI management activities such as the delivery of student support services in relation to accommodation and information provision to students.

1.2 Studentification

The impacts, both perceived and real, of ‘studentification’ is a key concept to be addressed in this report. It can be defined as ‘the social and environmental changes caused by very large numbers of students living in particular areas of a town or city.’\(^1\) Whilst the definition is neutral in tone, local residents often perceive the impacts of an increased student population as negative.

A 2006 report\(^2\) by Universities UK, the principal representative body for the higher education sector, usefully defines the impacts of students on local environments as falling into four categories; social, economic, physical and cultural. Both the positive effects and challenges identified by the Universities UK research are set out in the tables below. A stakeholder workshop run as part of the evidence gathering for this commission recognised the impacts in Plymouth as being broadly in line with those identified below.

---

\(^1\) Macmillan English Dictionary (2003)

Table 1: Student populations: positive effects

<table>
<thead>
<tr>
<th>Social</th>
<th>Cultural</th>
<th>Physical</th>
<th>Economic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student volunteering makes an important contribution to many aspects of social life</td>
<td>Create a critical mass and demand for diverse range of cultural events</td>
<td>Higher/rising property prices provide a level of incentive for upgrading properties which might otherwise remain empty, languish in a neglected state or be generally unfit for habitation</td>
<td>High demand for student housing and the stimulus to private rented sector leads to rising house prices</td>
</tr>
<tr>
<td>Student housing needs prevent serious depopulation in many inner-city areas</td>
<td>Enhances reputation of city/town as vibrant, dynamic location and as an attractive destination for eg, night-clubbing, evening economy, or tourism</td>
<td>Many older properties receive considerable investment by private landlords which extends their life</td>
<td>Growth in buy-to-let market and private investment opportunities</td>
</tr>
<tr>
<td>Increases the range of goods, services and attractions available to the town/city’s population</td>
<td>Student volunteering makes an important contribution to many aspects of social life</td>
<td>The existence of large numbers of young people help to make city centres attractive to social and retail spaces</td>
<td>Students constitute a flexible part-time labour force undertaking seasonal employment</td>
</tr>
<tr>
<td>A critical mass of students can ensure transport links to the benefit of the whole community</td>
<td>A critical mass of students can ensure transport links to the benefit of the whole community</td>
<td>Changes in type of retail and entertainment services available – e.g. local shops becoming cafes, bookshops, live music venues</td>
<td>Student presence can help stimulate urban regeneration</td>
</tr>
<tr>
<td>Student communities can also support nurseries and multi faith centres</td>
<td>Student communities can also support nurseries and multi faith centres</td>
<td>Student presence ensures the viability of some retail businesses</td>
<td>Student presence ensures the viability of some retail businesses</td>
</tr>
</tbody>
</table>

Table 2: Communities of students: challenges

<table>
<thead>
<tr>
<th>Social</th>
<th>Cultural</th>
<th>Physical</th>
<th>Economic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in low-level anti-social behaviour</td>
<td>Expansion of HMOs in traditional owner-occupied, family areas can lead to change in nature of communities</td>
<td>Reduction in quality of housing stock and neglect of external appearance to properties including gardens, due to lack of investment by absentee landlords</td>
<td>High demand for student housing and the stimulus to private rented sector leads to a rise in house prices, deterring access to housing ladder for other sections of community</td>
</tr>
<tr>
<td>Concentration of vulnerable young people with low awareness of security and highly attractive possessions leading to increased levels of crime. This can result in higher insurance premiums (ie, house, contents, vehicle)</td>
<td>Gradually self-reinforcing unpopularity of area for families wishing to bring up children</td>
<td>Turnover of properties and preponderance of property letting boards – recurring annually – detract from streetscape</td>
<td>A rising concentration of students in particular streets acts as a strong inducement to owner-occupiers of non-</td>
</tr>
<tr>
<td>Decreased demand for some local services</td>
<td>Conversion of houses into student residences, often make difficult transformation back</td>
<td>Increased population</td>
<td></td>
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</table>

<p>| Economic | | | |
|----------| | | |
| | | | |
| | | | |</p>
<table>
<thead>
<tr>
<th>Social</th>
<th>Cultural</th>
<th>Physical</th>
<th>Economic</th>
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<tr>
<td>leading to closure – particularly educational services</td>
<td>density and increased pressures on services (policing, cleansing, highways, planning, public transport)</td>
<td>student properties to take advantage of a lucrative sale to private student landlords</td>
<td>student properties to take advantage of a lucrative sale to private student landlords</td>
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<tr>
<td>Residents feel pressure to move to avoid becoming marginalised and isolated as permanent residents. This can lead to the demoralisation of established residents</td>
<td>Increased on-street parking pressures arising from shared households and seasonal traffic congestion (e.g. at graduations, end of term)</td>
<td>Changes in type of retail and entertainment services available – e.g. local shops becoming take-away’s and cafes, and re-orientation of stock</td>
<td>Changes in type of retail and entertainment services available – e.g. local shops becoming take-away’s and cafes, and re-orientation of stock</td>
</tr>
<tr>
<td>Increased competition for private rented houses</td>
<td>Increase of squalor (litter/refuse), as infrastructure is designed for lower density usage, low awareness of refuse collection arrangements and different conceptions of what is tolerable</td>
<td>Fluctuating demand for private rented housing</td>
<td>Fluctuating demand for private rented housing</td>
</tr>
<tr>
<td>Pressure for greater provision of establishments catering for night time entertainment and consequent detrimental impact on residential amenity</td>
<td>Noise between dwellings at all times especially music and at night – parties and gatherings and late night street noise disturbance</td>
<td>Seasonal employment (in shops, pubs) and provision of retail and leisure services</td>
<td>Seasonal employment (in shops, pubs) and provision of retail and leisure services</td>
</tr>
<tr>
<td>Seasonal availability of some retail and service provision – development of a ‘resort economy’</td>
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1.2.1 The Current Situation & Student Forecasts

The number of full-time students at the University of Plymouth and the University College of St Mark and St John (Marjon) has, over the last decade, grown by 26.5\%\(^3\). This is less than the average growth across the South West (46\%\(^4\)), or nationally (33\%\(^5\)), however, this does not account for Plymouth College of Art or Plymouth City College\(^6\). Growth over this period has not been met by a relative increase in bed-space provision within purpose built student accommodation in the City. The growth has therefore led to an increased demand for privately rented accommodation, particularly within Mutley and Greenbank and other established residential areas within walking distance of the University of Plymouth.

Discussions with the HEIs suggest that student numbers are unlikely to increase so rapidly over the coming decade in Plymouth, particularly with the current funding constraints in Higher Education. So, whilst there is an existing peak student accommodation demand that needs to be managed, the situation is not expected to become more pronounced in the immediate future.

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3 HESA data for 1998/9 and 2008/9
4 Savills Research, Spotlight on Student Housing, June 2010 using HESA
5 Savills Research, ibid
6 Statistics not available through HESA
It is worth noting that often the negative impacts associated with HMOs are all attributed to students, when in reality there are a range of young people living in HMOs who contribute to the perception of other local residents. It is harder to quantify the numbers who fall into this group.

1.2.2 ‘Destudentification’

Whilst the rise in student numbers is seen as an important issue in many communities adjacent to Higher Education establishments, ‘destudentification’ is also becoming an increasingly significant issue. ‘Destudentification’ is described by Dr Darren Smith as ‘the abandonment of student areas by students and student landlords’ and is becoming a reality in university cities such as Leeds, Birmingham, Nottingham and London. It is generally caused by the oversupply of student HMO bed spaces, due to the increase in numbers of purpose-built student accommodation. Often student HMOs are not replaced by family homes, but rather by A8 migrants or asylum seekers living in HMOs, which does not result in the balanced community that most residents’ associations and local authorities are hoping to achieve.

These problems may be exacerbated by a change in housing benefit allowances introduced by the UK government in October 2010. Those under 35 years old will only be allowed to claim for a room in a shared house, rather than a self-contained flat. This is likely to create a rise in demand for HMOs from other groups.

It will be important to consider the interventions that might lead to ‘destudentification’ occurring in the Plymouth context.

1.3 Planning Legislation for Homes in Multiple Occupation (HMOs)

Before considering the current demand and supply issues (and options for intervention) with respect to student housing in Plymouth it is worth briefly summarising the regulatory framework for Homes in Multiple Occupation (HMOs). In recent months, the legislative framework for HMOs has changed significantly with the issuing of Circular 5/10 which aligns the Use Classes Order with the definition of a HMO within the Housing Act 2004.

Since the amendments to the Use Classes Order came into effect on the 6th April 2010, a further amendment has been brought in by the new coalition Government, from 1st October 2010.

1.3.1 Pre Circular 5/10 Regulatory Position.

Prior to the guidance set out in Circular 5/10 the regulatory framework did not define ‘multiple occupation’ nor ‘HMO’ but relied on the concepts of ‘single household’ and ‘family’ in order to assist with making distinctions between use classes. To this end, HMOs were unclassified by the Use Class Order and grouped as a sui generis use (of its own kind).

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8 The A8 countries are Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia and Slovenia
Pre Circular 5/10 the Use Classes Order defined a dwelling house as class C3. This use class was subdivided into the following categories:

a) Covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary, personal assistant), a carer and the person receiving the care and a foster parent and foster child.

b) C3(b): up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.

On this basis, planning permission would be required to change the use of a dwelling house to an HMO (with over 6 bedrooms), provided a material change of use had occurred.

1.3.2 Amendment to the Town and Country Planning (Use Classes) Order 1987 & Circular 5/10

On the 27th January 2010, the Department for Communities and Local Government (CLG) published a document entitled ‘Houses in multiple occupation and possible planning responses: consultation – summary of responses’10. This document provided a summary of responses to the aforementioned consultation and outlined the Government’s response.

The chosen route the then Government decided to adopt was twofold:

1. Amend the Town and Country Planning (Use Classes) Order 1987 to provide a specific definition of a HMO. This definition should be in line with the definition provided by the Housing Act 2004 in order to provide clarity and align housing and planning legislation. As a result of this amendment, planning permission will be required where a material change of use has occurred, for properties changing use from C3 class (dwelling house) to the new use class, C4 HMO.

2. An additional C3(C) class, which allows for up to 6 people living together as a single household (e.g. small religious community, or owner occupier plus lodger), and amend the Town and Country Planning (General Permitted Development) Order 1995 to permit the movement from the new C4 HMO class back to the C3 class (dwelling house) without the need to obtain planning permission.

CLG also stated that the new legislation would not be applied retrospectively. However, since the 6th April 2010 all landlords seeking to establish a HMO have been advised to seek advice from their LPA in order to determine whether a material change of use would occur in their specific circumstances.

1.3.3 Announcements on HMOs by the Coalition Government.

The Housing Minister, Grant Shapps, announced on the 18th June 2010 that greater flexibility should be given to LPAs to deal with HMO properties. Amendments to the regulations became effective as of 1st October 2010 as follows:

- Retention of the C4 HMO class but amending the Town and Country Planning (General Permitted Development) Order 1995 further to allow a use class change both from C3 to C4 and back again. This will reserve the decision made by the previous government requiring planning permission for conversion to an HMO.

- The ability for the local authority to introduce an Article 4 Direction to override the above provisions for areas of their district where they wish to control the concentration of HMOs.

These proposals were subject to a judicial review challenge by three local authorities in October/November 2010. However, this challenge was not successful.

It is worth noting that the application of an Article 4 Direction for these purposes will incur costs for the local authority, as identified by the National HMO Lobby:

1) The preparation of the Direction, which will involve baseline research, proposals, consultation and notification, will absorb housing and planning officer time.

2) More significantly, once the Direction is implemented, the local authority becomes liable for compensation claims from unsuccessful applicants, unless it gives 12 months notice that the Direction will be applied. In the current climate of public sector funding restraint it is likely that members may be cautious about exposure to such compensation claims.

3) Finally, once the Direction is in place, LPAs will process HMO applications at a cost - as no fee will be payable11.

Where an Article 4 Direction is enacted express planning permission would be required for a material change of use.

1.4 HMO Licensing

As stated in above in Section 1.3, the Housing Act 2004 introduced a detailed definition of an HMO. The Act defines HMOs as living accommodation, which is occupied by three or more persons who do not form a single household and who share a kitchen, bathroom or toilet.

Part 2 of the Housing Act 2004 introduced mandatory licensing for certain types of HMO. Mandatory licensing applies only to: “HMOs, which are of three or more storeys and are occupied by five or more people forming two or more households.”

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11 National HMO Lobby, Response to the Consultation on Houses in Multiple Occupation: Changes to Planning Legislation, July 2010
This legislation was introduced in order to try and raise the management and amenity standards in the rented property sector. HMO properties were identified as being an area of the market, which are often poorly managed, and in a poor state of repair.

By being licensed, the property is deemed suitable by the LPA for occupation by a maximum number of persons/households as defined by the license. The other aspect is for the LPA to ensure the landlord is competent to manage the property. These changes should help to ensure that landlords provide a minimum set of standards and are reputable.

Landlords benefit from this license by firstly receiving support from the local housing authority and secondly being able to guarantee a certain standard of accommodation for prospective tenants.

Local authorities may designate areas within their District to be subject of additional licensing for HMOs which do not fall within the Housing Act HMO definition as outlined above. This allows local authorities to control other types of HMO properties in the same way as the mandatory licensing regime does.

Finally, there is the legislative provision to implement selective licensing. Selective licensing is often implemented in areas of low demand housing or where significant anti-social behaviour problems exist. Selective licensing applies to all forms of rented property within the defined area and not just to HMO properties.

Selective licensing aims to raise the standards of the overall rented housing stock to a specified acceptable level. This will then drive out those landlords and properties, which do not fulfill the license criteria, which in turn helps to tackle levels of anti-social behaviour.
2 Higher Education in Plymouth

There are currently four Higher Education Institutions (HEIs) in Plymouth:

- The University of Plymouth;
- The University College of St Mark and St John (Marjon);
- Plymouth City College; and
- Plymouth College of Art

There are a total of 22,514 full-time undergraduate students in Plymouth.

2.1 The University of Plymouth

2.1.1 Current Situation

The University of Plymouth is the largest of the four HEIs in the city, with a total of 30,930 students, of which 18,820 are full-time undergraduates.\(^\text{12}\)

It is estimated that approximately 20,000 students from the University of Plymouth are housed in the private rented sector “in the community”. Some will have previously lived in Plymouth, or will commute from elsewhere.

There are 1,772 places in University managed halls of residence\(^\text{13}\). The University also has a nominations arrangement with Unite, a provider of private, purpose-built student accommodation. This provides a further 653 bed spaces in 4 properties across the city\(^\text{14}\). In recent years purpose built accommodation has been consistently oversubscribed. In 2009, the University received 3,600 applications for purpose built accommodation\(^\text{15}\), approximately 65% above available provision.

Current University accredited purpose built provision accounts for approximately 7% of all University of Plymouth students, but there may be further students accommodated in private purpose-built accommodation which has no direct link to the University.

The University of Plymouth has an accommodation office which provides a service which accredits both letting agents and individual properties (with between 1 – 31 bedrooms). It is estimated that this route provides approximately 5,000 bed spaces (there were 973 properties registered in February 2010\(^\text{16}\)), leaving 15,000 students to find accommodation elsewhere.

2.1.2 Future Plans

The University of Plymouth hopes to expand its current portfolio of purpose built accommodation in order to be able to house all of its first year, full-time undergraduate students by 2011\(^\text{17}\). This is in response to student demand; a survey

\(^{12}\) HESA data 2008/9

\(^{13}\) http://www.plymouth.ac.uk/pages/view.asp?page=6777

\(^{14}\) http://www.plymouth.ac.uk/pages/view.asp?page=18158

\(^{15}\) University of Plymouth, Briefing on Student Accommodation Strategy, February 2010

\(^{16}\) ibid

\(^{17}\) ibid
showed that 94% of students would prefer to live in this type of accommodation on arrival in Plymouth\textsuperscript{18}.

The University of Plymouth has an ambitious internationalisation strategy, and wishes to be in a position to offer purpose built accommodation to all international students. There are no publically available figures for projected increases in international student numbers.

2.2 The University College of St Mark and St John (Marjon)

2.2.1 Current Situation

The University College of St Mark and St John (Marjon) has a total of 4,080 students, of which 2,090 are full-time undergraduates\textsuperscript{19}. Marjon has a higher than usual proportion of ‘non-traditional’ students (e.g. postgraduates and mature students). ‘Non-traditional’ students are likely to live in the private rented sector in Plymouth; many will already be resident in Plymouth, or will live at home and commute from further afield.

Marjon has 480 bed spaces in halls of residence on campus; this provides enough accommodation for first year (both undergraduates and postgraduates) students who are not residents of Plymouth or commutable environs.

2.2.2 Future Plans

The Lozenge is a new development that is planned within 5 minutes walk of Marjon. This will provide 123 new bed spaces in purpose built accommodation. It is due to open in summer 2011, and will also target students and others at the Peninsular Medical School, Allied Health professional building and the new Dental school. At the time of writing Marjon had not committed to any agreement with the developer.

Whilst Marjon is looking increasingly to the international market, they do not anticipate that this will lead to a growth in student numbers in the near future.

2.3 City College Plymouth

2.3.1 Current Situation

City College Plymouth is largely a Further Education College, but with a growing number of Higher Education courses. The College has a total of 17,803 students, although the majority of these will not require accommodation. It does, however, include 914 higher education students and 185 international students’.\textsuperscript{20}

City College Plymouth has none of its own accommodation, but recommends Unite as a provider of purpose built accommodation.

\textsuperscript{18} As reported by the University of Plymouth
\textsuperscript{19} HESA data 2008/9
\textsuperscript{20} Source: South West FE Colleges Impact Assessment April 2008 (based on figures for 2006/7), http://www.cityplym.ac.uk/about-us
2.3.2 Future Plans

The College’s plans for a big capital development have had to be put on hold as a result of the reduction in public spending in this area. The College is now preparing plans for refurbishment and small scale expansion to meet the needs of curriculum areas where demand is greater than the current capacity\textsuperscript{21}. There are no published details of any plans for growth in student numbers.

2.4 Plymouth College of Art

2.4.1 Current Situation

In the 2009-10 academic year there were a total of 1962 students (including FE and those on part-time evening courses etc) at the Plymouth College of Art, of these 690 are full-time Higher Education students, the breakdown of where these students live is shown in table 3 below.

<table>
<thead>
<tr>
<th>Postcode</th>
<th>Total no. of students</th>
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<tbody>
<tr>
<td>PL</td>
<td>460</td>
</tr>
<tr>
<td>TQ</td>
<td>66</td>
</tr>
<tr>
<td>EX</td>
<td>39</td>
</tr>
<tr>
<td>Not In PL,TQ or EX</td>
<td>125</td>
</tr>
<tr>
<td>Total</td>
<td>690</td>
</tr>
</tbody>
</table>

Table 3: Student numbers by postcode, source: Plymouth College of Art, Aug 2010

Plymouth College of Art has minimal numbers of international students; there are currently estimated to be five.

Currently information is provided to students on accommodation options, including walking tours and presence at open days of some purpose-built providers, but there are no formal links between the College of Art and accommodation providers.

2.4.2 Future Plans

Whilst there are no published plans for increases in student numbers, it has been reported that Plymouth College of Art are hoping to increase international student numbers\textsuperscript{22}, which is likely to result in an increased demand in student accommodation within the City of Plymouth.


\textsuperscript{22} As reported in private correspondence
3  Student Housing Distribution

Students live within many, if not all communities within Plymouth, but are predominantly concentrated in the neighbourhoods of Mutley and Greenbank, in and around Drake ward, as can be seen in figure 1 below.
Figure 1: Distribution of student housing in Plymouth (not to scale)
Table 4 sets out figures on tenure of housing stock and on student numbers, from the 2001 census. This shows that Drake ward has almost half the number of owner-occupied homes than the Plymouth average. This will have become even more marked as student numbers have risen steadily in the city over the last decade. The table also shows that the relationship between the private rented sector and student population does not always correspond, but in many areas the number of students is clearly a reason for the high percentage of dwellings in the private rented sector.

Table 4: % population by tenure and student, source: 2001 census

<table>
<thead>
<tr>
<th>Ward</th>
<th>Owner-occupied</th>
<th>Social rented</th>
<th>Private rented</th>
<th>Student population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drake</td>
<td>36%</td>
<td>16%</td>
<td>46%</td>
<td>24.0%</td>
</tr>
<tr>
<td>Stoke</td>
<td>66%</td>
<td>10%</td>
<td>22%</td>
<td>1.1%</td>
</tr>
<tr>
<td>Peverell</td>
<td>84%</td>
<td>3%</td>
<td>11%</td>
<td>0.9%</td>
</tr>
<tr>
<td>Compton</td>
<td>73%</td>
<td>6%</td>
<td>19%</td>
<td>3.8%</td>
</tr>
<tr>
<td>Sutton and Mount Gould</td>
<td>56%</td>
<td>13%</td>
<td>30%</td>
<td>6.0%</td>
</tr>
<tr>
<td>St Peter and the Waterfront</td>
<td>27%</td>
<td>44%</td>
<td>26%</td>
<td>3.6%</td>
</tr>
<tr>
<td>Efford and Lipson</td>
<td>58%</td>
<td>26%</td>
<td>14%</td>
<td>3.1%</td>
</tr>
<tr>
<td>Plymouth</td>
<td>64%</td>
<td>21%</td>
<td>13%</td>
<td>1.7%</td>
</tr>
<tr>
<td>England</td>
<td>69%</td>
<td>19%</td>
<td>10%</td>
<td>0.6%</td>
</tr>
</tbody>
</table>
4 Impacts and Issues in Plymouth

On Tuesday 9th August 2010, a workshop was held with representatives from the following organisations:

- Plymouth City Council
- University of Plymouth Students' Union
- College of St Mark and St John
- Plymouth College of Art
- Private Landlord forum
- Greenbank Neighbourhood Office
- Mutley Greenbank Trust
- Mutley Meeting Place
- Greenbank Community Association
- Devon and Cornwall Police
- Councillors from St Peter & Waterfront Compton and Drake wards
- University of Plymouth

The objective of the workshop was to identify both the positive and negative impacts of the student population in Plymouth. Many of the benefits and challenges identified through discussion were similar to those in the Universities UK report and set out in section 1.2. There was clear recognition of the benefits that the HEIs bring to Plymouth in terms of cultural diversity and vibrancy, and also in terms of economic development (from employment in HEIs and in the wider economy through provision of a future skilled workforce). The negative impacts identified were more varied, but there was particular emphasis on anti-social behaviour, the quality of the local environment (particularly noise and rubbish) and loss of “community feel” in neighbourhoods where HMOs are particularly concentrated. The perceived impacts identified through the workshop are further corroborated by analysis of data collected from the city council’s Waste and Street Scene Complaint Service which indicates that there were over 475 complaints relating to litter in Mutley and Greenbank in 2009/10 (including fly tipping, street sweeping and bins)\(^{(23)}\). Furthermore the Public Protection Service received the greatest number of calls regarding Mice and Noise Nuisance in Mutley and Greenbank in 2009/10\(^{(24)}\).

Further work is being done to look at anti-social behaviour in Mutley and Greenbank. Data is being compiled from the police and council departments. It was not known at the time of writing this report to what extent anti-social behaviour can be attributed to high levels of student population.

There is no one solution to any of the negative impacts identified, but a mixture of interventions will be required in order to address these issues in Plymouth. Many of the options for intervention were discussed at the workshop and views sought. These have been taken into account in the recommendations drawn up in the following chapters of this report.

\(^{(23)}\) Data provided by Plymouth City Council 5th August 2010
\(^{(24)}\) Data provided by Plymouth City Council 5th August 2010
5 Options for Intervention

A range of options for intervention are open to Plymouth City Council and its partners to manage the impacts of HMOs on local communities and the balance and quality of housing stock therein. The options for intervention can be grouped into the following three categories:

- **Development Management Policies.** A number of alternative policy options exist and are currently in use by other LPA’s. The pros and cons of each policy option are considered below.

- **HMO licensing,** including improved enforcement of mandatory licences, and extension of local licensing procedures to include additional and selective licensing; and

- **The introduction of a range of voluntary management initiatives** in partnership with Plymouth City Council, the HEIs, the local community and students groups.

These options are not mutually exclusive, and indeed may be more effective if considered as part of a wider strategy. Each of these interventions is considered more fully below.

University cities across the UK have been working to integrate student populations into communities for some time, particularly following the trend for steadily rising student numbers in recent years. Local authorities and universities often work together to ensure a positive outcome for students and other local residents. Each city will have its own issues and challenges, but some approaches may be replicable and we have included examples of successful interventions from elsewhere to illustrate the opportunities available in the Plymouth context.

5.1 Planning Policy Options

A review of Local Development Frameworks has identified that there are typically three types of planning policy approach used by local authorities to manage the concentration of HMOs generally or student accommodation specifically. These policy options can be described as:

- The ‘threshold approach’;
- “Areas of restraint”; and
- Encouragement of purpose built accommodation.

The approaches are not mutually exclusive; indeed many of the local authorities we have taken reference from use more than one policy approach in combination.

It is worth making the point that as policy cannot be retrospectively applied there is a limit to the impact that planning policies can have on current concentrations of HMO or student accommodation within neighbourhoods, such as Mutley and Greenbank.

5.1.1 Policy Option 1: The Threshold Approach

The threshold approach can be defined as a ceiling above which certain forms of development are not permitted. This might be on a street-by-street basis across the
city, or on a neighbourhood basis. In other authorities the policy is either applied to HMOs generally or student accommodation specifically.

This form of policy provides a degree of protection against further concentrations of activity in streets or neighbourhoods where HMOs already exist, as well as areas where there is limited HMO activity but the housing stock potentially lends itself to a change of use from family to multiple occupancy households. The approach requires the setting of a threshold ceiling for the defined area or areas of the city. The threshold is typically based on the total population of the defined area rather than housing stock. Threshold calculations will be required under this policy when a planning application is submitted for change of use from C3 TO C4. Although not a complex process this would have resource implications for the planning team at Plymouth City Council.

Several examples of the application of this approach in other university towns and cities are outlined below:

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**Nottingham**

Nottingham is home to two major universities and has some areas of very dense student housing. The city council has a Supplementary Planning Document (SPD), *Building Balanced Communities*, which was produced in 2007, to reflect saved policies in the Local Plan. The policy reads:

“In areas of existing significant student household concentration the following development will not usually be permitted:

- Purpose built student accommodation and alterations, extensions and re-developments of existing purpose built accommodation which would result in a net increase in bedspaces;
- Houses in Multiple Occupancy; and
- New flats and houses of 3 or more bedrooms unless subject to an occupation condition preventing the property being used as a dwelling house solely by students in full-time education, living together as a single household.”

An area of “significant student household concentration” is defined as a super output area and contiguous super output areas with over 25% of all households being occupied by students.

Feedback from Nottingham City Council suggests that the development management team favour this approach as it provides a concrete framework for decision making. The resource required to calculate the threshold is not considered to present a barrier to implementation as the planning policy team only receives a couple of requests a month.

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**Loughborough (Charnwood Borough Council)**

Charnwood Borough Council has an SPD, *Student Housing Provision in Loughborough*, particularly aimed at addressing the concentration of student housing close to the University of Loughborough. The document defines 3 bands of concentration of student households.

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This approach enables the direction of policies of different weight to different neighbourhoods proportionate to the level of student occupation in a targeted fashion. The relevant policies are set out in the matrix below.

<table>
<thead>
<tr>
<th>Threshold Categories (% Student Households [Weighted])</th>
<th>A &gt;20%</th>
<th>B 10-20%</th>
<th>C &lt;10%</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Planning permission will not be granted for the development of purpose built student housing and extensions to existing student halls and flats. *</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Planning permission will not be granted for the development of purpose built student housing and extensions to existing student halls and flats where that development would give rise to excessive noise or disturbance to neighbouring dwellings.</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>c) Planning permission will not be granted for the conversion of Class C3 dwellings and other buildings to provide Large Unmanaged Residences for Students (LURS) housing more than six people living together as a single household*</td>
<td>✓</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>d) Planning permission will not be granted for extensions to Class C3 dwellings where there is evidence of the property being occupied, or intended for occupation, by students and where the development proposed would provide additional habitable rooms for occupation by students. (Where there is no evidence of existing or intended student occupation and the proposed extension is otherwise acceptable, conditions will be attached to preclude its occupation by students).*</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) In approving the development of new houses and flats the Council will impose conditions or seek a Section 106 agreement to prevent their uncontrolled occupation by students*</td>
<td></td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>f) Adoption of a Planning Enforcement regime in partnership with Building Control and local communities to ensure permitted development complies with the provisions of the General Permitted Development Order and to ensure that landlords and developers are aware of national and local policies before commencing operations on site.</td>
<td>✓</td>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>

* - excluding University/College Campus and the Town Centre with adjoining opportunity sites”

Glasgow

Glasgow’s policy sets the threshold level at just 5% (as opposed to 20% which is typically used elsewhere), but applies to HMOs rather than student properties specifically. The threshold is set per street. In Scotland, the relevant legislation is slightly different, with an HMO being defined as a house of over 3 people since 2002. This might explain the lower threshold level, as there will be a larger number of smaller HMOs.

Manchester

Manchester has included a draft policy in the emerging Core Strategy for the city; no comment can therefore be made on the effectiveness of the policy.

The Manchester threshold is 20% within a 100m radius of any proposed development that requires planning permission. Change of use from a C3 dwelling house to a C4 HMO or a sui generis HMO is not permitted within the threshold areas, and extensions are not allowed where they could be expected to result in an increase in the level of occupation. The policy does also state that “Conversions or change of use of existing properties into flats or houses in multiple occupation, where concentrations are lower than 20%, will be permitted only where the accommodation provided is of a high standard and where it will not materially harm the character of the area.”

5.1.1.1 Commentary on the Threshold Policy Approach

A 20% threshold is the most common limit used by other authorities. However, the HMO Lobby believe that a sustainable, balanced community should not have more than 10% HMO properties, as this is likely to represent 15% of the population.

The threshold can be based on a street by street basis, distance from the site applying for planning application or by super output area. Super output areas may be difficult for the lay person to understand, streets can vary greatly in size, so distance from the building appears to be the simplest and fairest approach to a threshold policy.

Most other cities apply a common threshold ceilings city-wide, to ensure comparable and equal treatment across the city.

Student council tax is the most widely used data for making comparisons, but this is sometimes coupled with data on purpose-built accommodation, licensed HMOs and properties benefitting from C4 or sui-generis planning consent.

Whilst the threshold approach may represent some additional resource requirements to undertake calculations to establish whether a proposed scheme falls into an area that reaches the threshold, it is a policy that should future-proof other areas becoming ‘studentified’ if a new area becomes popular with students.

29 This is based on a HMO with more than 5 occupants, National HMO Lobby, Balanced Communities & Studentification: Problems and Solutions, 2008, http://hmolobby.org.uk/39articles.pdf
Discussions that we have had with other authorities suggest that the resource required to manage this policy is not onerous and should not preclude this option being considered by Plymouth City Council.

5.1.2 Policy Option 2: Areas of Restraint

An area of restraint can be defined as an area where restrictions are imposed on certain forms of housing (this could be purpose built student accommodation or HMOs).

This type of criteria based policy can be useful for areas where student housing is very concentrated, such as Greenbank and Mutley. Its application is less resource intensive than the threshold approach, but will not protect against the future studentification of new areas. If the boundary of an area defined as an ‘area of restraint’ is drawn to tightly then it could result in the leapfrogging of HMO activity to adjacent streets or neighbourhoods.

Below several examples of the application of this policy are outlined.

Leeds

Hyde Park and Headingley in Leeds were identified as one of the worst places in the UK on the ‘anomic’ index\(^\text{30}\), meaning it had very low levels of community cohesion. Many local residents groups attribute this to the high levels of student housing in the area\(^\text{31}\).

In 2006, Leeds City Council introduced an area of restraint policy\(^\text{32}\). The initial proposals put forward by the City Council were modified as a result of the UDPs inspectors report\(^\text{33}\). The inspector questioned whether a policy focusing on student housing, rather than HMOs was discriminatory, and argued for a much wider area of restraint than Leeds originally wanted. The Council was also required to move from stating development that would not be permitted to defining the criteria under which development would be permitted.

The ‘Area of Housing Mix’ covers Headingley, Hyde Park, Burley and Woodhouse where students form a significant part of the population, together with the adjoining areas of Moor Grange and Lawnswood where it is considered that pressure is likely for further student housing.

Discussions with staff at Leeds City Council suggest that the current policy was not strong enough to be as effective as they would have liked, but they were still able to refer to instances where the policy had been used successfully to uphold decisions. The policy has yet to be tested at appeal.

The wording of policy H15 is set out below:

“Within the area of housing mix planning permission will be granted for housing intended for occupation by students, or for the alteration, extension or redevelopment of accommodation currently so occupied where:

i. The stock of housing accommodation, including that available for family occupation, would not be unacceptably reduced in terms of quantity and variety;

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\(^{30}\) Social And Spatial Inequalities (SASI) group, University of Sheffield, Changing UK: The way we live. Anomie Index 2008, [http://sasi.group.shef.ac.uk/research/changingUK.html](http://sasi.group.shef.ac.uk/research/changingUK.html)

\(^{31}\) See [http://hmolobby.org.uk/leeds/whenleedsmethaddingley.htm](http://hmolobby.org.uk/leeds/whenleedsmethaddingley.htm) for example


There would be no unacceptable effects on neighbours’ living conditions including through increased activity, or noise and disturbance, either from the proposal itself or combined with existing similar accommodation;

The scale and character of the proposal would be compatible with the surrounding area;

Satisfactory provision would be made for car parking; and

The proposal would improve the quality or variety of the stock of student housing”

**Newcastle**

Newcastle has an Area of Housing Mix policy that is similar to Leeds’. It covers a smaller area than the Leeds policy, and as can be seen in the plan below, is not contiguous.

The policy states that planning permission will be granted, unless:

i. “it would facilitate the creation of additional habitable accommodation in the roof space of an upper Tyneside flat and so remove the dwelling from the stock of relatively affordable smaller housing units within the overall housing mix; or

ii. it would result in the loss of good quality, spacious and convenient accommodation suitable for occupation by a family and so remove the dwelling from the stock of units suitable for occupation by a family within the overall housing mix; or

iii. there would be unacceptable harm to the amenity of existing or future residents caused by reduced daylight, sunlight, outlook or privacy or additional activity with increased noise and disturbance; or

iv. the proposal by reason of scale, design or loss of existing features including trees and landscaping would be detrimental to the character and appearance of the locality or the existing building; or

v. the development would result in the introduction of such additional accesses, traffic or parking as would prejudice road safety or lead to unacceptable visual intrusion or impact on residential amenity; or

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34 Newcastle LDF, Supplementary Planning Document on Shared Housing, http://www.newcastle.gov.uk/core.nsf/a/ldf_shared_housing
vi. there are other overriding planning reasons not covered in this SPD for not granting permission.”

5.1.2.1 Commentary on the Area of Restraint Approach

The Leeds example and particularly the comments of the inspector should be taken into account in developing a policy approach for Plymouth. It may be appropriate to refer to HMOs rather than student housing wherever possible within policy wording and to define the criteria that would need to be fulfilled in order for HMO proposals to be acceptable (rather than a blanket refusal).

Discussions with other authorities indicate that an ‘Area of Restraint’ policy is likely to be less resource intensive to apply than the ‘Threshold approach’, but may be a blunter policy instrument, and may not future-proof against new areas of the city becoming popular with students, as the areas included in the policy have to be selected when the policy is developed. Whilst ‘Area of Restraint’ policies may not have a great deal of influence over the existing community mix in neighbourhoods where transition from family housing stock to HMOs has already occurred, they are a useful tool in the preventing an imbalance occurring.

It is suggested that, in order to reduce the resource required by Plymouth City Council, that it could be the responsibility of the applicant to submit information
with an application on the % of properties in HMO use in order to comply with the requirements of this policy. It is expected that the City Council would still need to make the raw data available to applicants in order to ensure a level playing field. This does not appear to have been an approach taken by other local authorities, but is likely to make the policy more attractive in Plymouth.

5.1.3 Option 1a and 2a: Article 4 Direction

As discussed briefly in Section 1.3.3, the City Council has the option of introducing an Article 4 Direction for all or part of the city, meaning that planning permission would be required for conversion of a dwelling house (use class C4) to an HMO (use class C3, with 3 to 6 residents). This would be necessary if either policy options 1 or 2 (Threshold or Area of Restraint) are to be effective.

An Article 4 Direction would need to be approved by the Executive, a notice must be published through a local advertisement, and at least two notices posted stating a place where the Direction can be inspected. A period of at least 21 days must be allowed for consultation. A copy of the notice is served on the Secretary of State in case he wishes to modify or quash the direction. He can do this anytime before it comes into force.

A period of at least 28 days and no more than two years must be allowed before an Article 4 direction comes into force. The Government has stated that the compensation provisions that normally apply to Article 4 Directions be limited to a liability where less than 12 months notice is given. The liability extends to abortive expenditure such as conversion work and depreciation from the loss of the permitted development rights. Exeter City Council has estimated that the liability could extend to a five figure sum on a single claim, based on market value. However, research carried out by RPS in 2008 found in a review of 72 councils, that compensation had never been claimed. The same study indicated that a number of local authorities had experienced 1 or 2 additional planning applications per week. Whilst this may not be directly equivalent to HMO change of use, it provides some indication of the level of risk.

The City Council could choose to provide 12 months notice to avoid compensation, meaning an Article 4 direction could not take effect until after this time. There has been some concern expressed by other local authorities and the HMO lobby that there would be an increase in conversions to HMOs in this time period, resulting in a worsening of the negative impacts of HMOs in a short space of time. However, given current market conditions, this risk is perhaps not as severe as it could have been in a more buoyant economy with forecast strong growth in student numbers in Plymouth.

It is not yet clear how many other local authorities will choose to implement an Article 4 Direction. Manchester’s threshold policy (see 5.1.1) was drafted before the latest announcement, and it is not yet clear how they will proceed. Exeter City Council is planning to introduce an Article 4 Direction with a 12 month notice period for its most densely populated student areas.

35 RPS Planning Research into the use of Article 4 directions on behalf of the English Historic Towns Forum, October 2008
5.1.3.1 **Commentary on Article 4 Direction**

In terms of change of use, options 1 and 2 would only apply to sui generis developments and not to C3 to C4 changes unless an Article 4 Direction was applied. However, there are risks associated with this approach, either with the 12 month notice or without.

Any area covered by an Article 4 Direction should have regard to areas where there is an existing problem of a concentration of HMOs that the Council may wish to control and a ‘buffer zone’ of areas that have a lesser concentration and may come under pressure due to future expansion. The area to be covered by an Article 4 Direction may be to some extent dependent on whether a ‘Threshold’ policy or an ‘Area of Restraint’ policy is selected.

Figure 2 below shows levels of student housing in Plymouth by neighbourhood, and delineates an area that could be appropriate for an Article 4 Direction to be applied. We have had to use student households as a proxy for HMOs, as there is no other way of collecting this data (for all households of 3 households and above) at present.

The area described covers the four neighbourhoods with above 10% student households at present, along with a buffer zone around it to prevent a ring of student properties around the original area. It is thought that the figures in Derriford include the Marjon halls of residence, so this area has been discounted. The Article 4 area could be slightly expanded (e.g. to incorporate Devonport) or retracted (e.g. excluding Beacon Park & Pennycross) if considered appropriate.
Figure 2: Possible Article 4 area (not to scale)
5.2 Policy Option 3: Encouragement of Purpose-Built Accommodation

Plymouth only has enough purpose built accommodation for approximately 10% of its current student population. The University of Plymouth has stated its desire to increase the number of bed spaces in purpose built accommodation within the city centre to respond to demand, particularly from first year undergraduates and international students. Providing purpose-built accommodation can relieve pressure on other forms of accommodation. This type of accommodation also gives HEIs and the City Council (through planning conditions and section 106 agreements) more control over the types of management interventions that can be enforced. For example, through clauses in student tenancy agreements, or by designing accommodation that has well thought through waste management or an effective green travel plan.

It can be argued that purpose-built accommodation encourages segregation of students from the rest of the population, and provides disincentives for community cohesion. However there is also a pool of evidence that suggests that this type of accommodation is very popular with students, particularly first year undergraduates, and also provides a flexible solution for students who don’t require a permanent accommodation solution for the full academic year.

Policies encouraging purpose built accommodation as part the housing mix within defined locations of University towns and cities are relatively commonplace. Below are several examples of this type of policy:

Manchester

Manchester’s emerging core strategy\(^{36}\) covers a list of criteria that have to be met for a planning application for new purpose built accommodation to be approved. The criteria cover:

1. Accessibility to the University campus by walking and cycling
2. Land-use, density and car parking
3. Regeneration and integration with existing neighbourhoods
4. Safety and security (both for users and in the surrounding area).
5. Design and layout of accommodation to ensure that there is no unacceptable effect on residential
6. Re-use of Listed Buildings
7. Management of waste disposal facilities
8. Demonstration of the need for additional student accommodation
9. Deliverability

Oxford

Oxford is home to two large universities; the University of Oxford and Oxford Brookes University.

Oxford City Council has incorporated a policy into its emerging Core Strategy\textsuperscript{37}, stating that:

“All increases in student numbers (at Oxford Brookes University and the University of Oxford) as a result of increases in academic floorspace must be matched by a corresponding increase in purpose-built student accommodation.”

This approach helps to protect against future growth in student numbers proportionately increasing the demand for unregulated student housing.

Sheffield

Sheffield’s core strategy contains a policy on creating mixed communities\textsuperscript{38}, which it states will be achieved in part by:

“providing new purpose-built student accommodation as part of a mix of housing development, with a mix of tenures and sizes of unit on larger sites, primarily in the City Centre and the areas directly to the north west and south of the City Centre;”

This is a relatively generic policy, but it states specific areas of the city which are considered suitable for development of purpose built accommodation. Charnwood Borough Council takes a similar approach in Loughborough.

5.2.1.1 Commentary on Purpose Built Accommodation Policies

As set out in Section 2, Plymouth currently has an undersupply of purpose built student housing and there is an obvious demand for further supply demonstrated by the HEIs, as well as interest from commercial developers and investors. Given this demand it would seem appropriate that a policy supporting its development is developed for the City. This would in no way conflict with a ‘Threshold’ or ‘Area of Restraint’ policy option (options 1 and 2). The combination of a purpose built accommodation policy with another policy is recommended by the HMO lobby\textsuperscript{39} and is common in other cities, such as Manchester and Nottingham. Purpose built accommodation needs to match student demand (e.g. in terms of space, design, location), and any negative impacts on surrounding communities will need to be mitigated against through good design and application of management measures. The supply of purpose built accommodation needs to be carefully managed and monitored to ensure that any reduction in the number of students seeking private rented sector accommodation does not have a


\textsuperscript{39} National HMO Lobby, Balanced Communities & Studentification: Problems and Solutions, 2008, p12 http://hmolobby.org.uk/39articles.pdf
detrimental effect on those communities where student-occupied HMOs are currently concentrated.\footnote{See section 1.2.2 on destudentification.}

### 5.3 HMO Licensing

In addition to planning policy the licensing of HMO activity is the main regulatory tool that local authorities can use to manage the quality of private sector stock in multiple occupation. There are three licensing options available to local authorities:

- Enforcement of mandatory licensing (the status quo);
- Additional licensing; and
- Selective licensing.

Licensing ensures that a property complies with certain safety regulations, is fit for the number of people living there, and can also impose some requirements on landlords to deal with anti-social behaviour. The main benefit will be ensuring higher standards for tenants.

For licensing purposes, an HMO is described as 5 or more unrelated people living in a property of three or more storeys (including loft room or basement) and sharing a basic amenity such as a toilet, bathroom or cooking facilities. Any property that falls into this category is currently required to have a mandatory HMO license. In Plymouth there are currently 638 dwellings that have a license\footnote{Figures provided by Plymouth City Council Strategic Housing team.}. The majority (over 70%) of these are in postcodes PL4 6-8, which broadly equates to the Mutley and Greenbank areas.

Local Authorities are responsible for enforcing mandatory licensing within their boundary. An Authority can also choose to implement additional or selective licensing, in all or some of its district. These options are set out in more detail below.
5.3.1 Additional Licensing

A local authority can choose for licensing to cover other HMO types not covered by mandatory licensing. This might be appropriate if the Council has particular concerns about a particular type of HMO not covered by mandatory licensing. Whilst additional licensing requires an additional resource, it also brings in an additional income, as there is a fee associated with each license.

Oxford

Oxford City Council has recently introduced an additional licensing scheme across the whole city. This was in response to the fact that HMOs are responsible for over 2000 service requests/complaints a year, a number which has been steadily rising. An estimated 1 in 5 of the resident population living in an HMO and with two large universities (and 38,000 students) in a city of just 150,000, students represent a large percentage of the population.

All HMOs are covered by Oxford’s scheme (i.e. any property with 3 or more unrelated people, and houses that have been converted into flats – section 257 HMOs – that are wholly or mainly tenanted).

The City Council received a large number of comments from landlords and agents who disagreed with the scheme. They were particularly concerned about their duty to become engaged with anti-social behaviour caused by their tenants. However, there was broad support from other respondents to the consultation.

Oxford City Council has set a target of licensing over 900 properties by March 2013. The Council chose an approach that covered the whole city to ensure equal treatment.

5.3.2 Selective Licensing

All rented properties in specified areas can be required to apply for a license. This approach could be useful if there are specific problems with the standard of HMOs in a particular part of the city. Again, it would require additional resource, but bring in additional fees.

Manchester

Manchester city council introduced selective licensing gradually, meaning you now need licences for all accommodation you rent out in:

- the Harpurhey ward
- the Bradford ward (includes Beswick and Openshaw)
- the Gorton North and Gorton South wards
- parts of Moston

These areas do not correspond directly with areas of high student concentration, suggesting that this approach is not responding specifically to a student-related issue.

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5.3.3 Commentary on Licensing Options

Strengthening of licensing procedures and coverage could be a useful tool in Plymouth’s suite of measures to improve community cohesion in those areas of the City where HMO concentrations are already particularly acute. It is likely that people who live in homes that are of a better standard will have more pride in keeping their home in a better state of repair. Licensing is able to help improve the quality of HMOs, rather than the quantity, but both of these issues will be important for an overarching approach in Plymouth. There would be a resource requirement within the Housing team to introduce further licensing in Plymouth.

It is recommended that Plymouth City Council follows the progress of Oxford’s scheme for additional licensing across the city to analyse the impact that this has, and consider the possibilities that this might highlight for Plymouth.
5.4 Management Measures

There are numerous possible management measures that could be implemented either by Plymouth City Council, by some or all of the HEIs in the city and their Students’ Unions (SUs), by local residents’ groups or by a partnership of many or all of these partners and others. Some of the main options are set out below:

- Student charter;
- Student disciplinary (rules and regulations);
- Student community liaison;
- Activities to promote cohesion;
- Landlord accreditation scheme; and
- Student information provision.

5.4.1 Student Charter

A Student Charter is an agreement on rights and responsibilities between a student and their HEI. A number of universities across the country have implemented these, but their effectiveness is hard to define, as they are largely unenforceable. They may still be useful in alerting students to rules and regulations in a much more user-friendly style.

There is currently a national group looking at the feasibility of a national standards and guidance for Student Charters which will be reporting imminently.

University of East London (UEL)

The University of East London has a Student Charter which covers a wide range of issues, from application through to graduation. There is a section on Residential Services, which includes the following responsibilities of the University:

- guarantee accommodation in halls for new international students, new first year students from outside the local area, and students with disabilities or special needs, whose application form are received by 1 September;
- provide information on private sector accommodation and up-to-date lists of available properties, both shared flats and houses and lodgings in family homes.

And as a responsibility of all students:

“respect the local community both if you are living in halls of residence or private accommodation.”

There is no mention of any related policies in the University’s Manual of General Regulations, so it may be difficult for the Charter to carry much weight.

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43 University of East London, Student Charter, Summer 2010, [http://www.uel.ac.uk/studentcharter/index.htm](http://www.uel.ac.uk/studentcharter/index.htm)
Marjon, Plymouth

Marjon’s Student Charter\(^45\) contains a section on accommodation and includes responsibilities for students not living on campus:

- “Conduct yourself in an appropriate manner in your accommodation, whether it is on campus, or in the private rented sector
- Make your own arrangements for any non-University College accommodation, taking responsibility for all aspects of your tenancy”.

The University College undertakes to provide on campus accommodation for a large number of students, and also to “provide students not wishing / unable to take accommodation on campus, with a list of agencies and local landlords together with information on advisable practice in renting private accommodation. (N.B. The University College cannot undertake to check or approve non-University College accommodation).”

The Charter is backed up by Student Misconduct Procedures, which include both personal and professional misconduct.

5.4.1.1 Use of Student Charters in the Plymouth Context.

Some HEIs in Plymouth already make use of a Charter, but it could be encouraged more widely if felt appropriate. In addition to Marjon, City College Plymouth also has a Charter in place, but this does not refer to conduct in the community, this perhaps reflects the College’s focus on FE courses.

It is not known how much impact Student Charters have. It may be advisable to wait for the results of the national review by Universities UK before considering whether to work with HEIs to review existing Charters or draft new ones.

5.4.2 Student Disciplinary

This can involve the inclusion of an ‘anti-social behaviour in the wider community’ clause in HEI rules and regulations and enforcing these. It can also be useful for local authorities to create and enforce complimentary rules and regulations, for example in relation to car parking control or waste collection. This gives local residents a guarantee that complaints against students will be taken seriously.

Cardiff Council

Cardiff Council has started a campaign to improve waste collection in the city\(^46\). Following a period of education a zero tolerance policy was introduced in the Cathays area of the city (an area of highly concentrated student housing). 129 fixed penalty notices (£100) have been issued, for offences such as placement of rubbish, items wrongly put in recycling and waste put out for collection on the wrong day.

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\(^45\) http://www.marjon.ac.uk/aboutmarjon/institutionaldocuments/studentregulationshandbook/

\(^46\) http://cardiffdigs.co.uk/Unity%20news%20issue%203%20-%20%20o-res.pdf
University of Bristol

The University of Bristol introduced “Local rules and regulations for student behaviour in the community”\(^{47}\) in 2008, these are recognised in the University’s overarching Student Disciplinary Regulations.

The University recognises that it will not always be the appropriate body to discipline students in the community, and will not doubly penalise students where another body has already taken action. The rules and regulations cover:

- Complying with national legislation and local regulations and byelaws including car and motorcycle parking, refuse and recycling and noise pollution
- Any violent, indecent, disorderly, threatening, intimidating or offensive behaviour or language whether expressed orally or in writing, including electronically.
- Sexual, racial or any other form of harassment, including bullying.
- Excessive noise that causes a disturbance to other residents at any time of day or night.
- Any other behaviour that causes danger or distress.
- Any other misconduct (as defined by the Regulations) within the community.

The penalties that can be imposed are:

- A written reprimand;
- A caution;
- A fine not exceeding £100;
- The requirement to pay a reasonable sum by way of compensation for identified and quantified loss;
- The requirement to give and comply with a written undertaking as to future behaviour;
- The requirement to perform unpaid services for the University community to a maximum of 20 hours;
- Exclusion, for a specified period, from the use of a specified University service or facility (including specified residential facilities) to which the misconduct relates.

The rules are regularly reviewed and are agreed with the Students’ Union. These rules reflect and enforce the University’s Student Agreement (similar to a Student Charter).

5.4.2.1 Use of Student Disciplinary in Plymouth

Strong rules and regulations relating to student behaviour can be a useful tool for HEIs to show their commitment to tackling any anti-social behaviour by their students. As the example from Bristol shows, this does not have to mean duplicating the role of any other body, such as the police or local authority. It is recommended that legal advice is sought for any rules and regulations that are drawn up.

Enforcement action taken by Plymouth City Council can also be a powerful tool. It may be appropriate for different partners to regulate over different issues. A

\(^{47}\) University of Bristol, *Local rules and regulations for student behaviour in the community*, 2008

http://www.bristol.ac.uk/accommodation/prs/community/localrules.html
partnership approach between the HEIs, Devon and Cornwall Constabulary and Plymouth City Council should avoid overlap and duplication of resource.

Regulation is likely to be most effective when combined with other tools, such as education and encouragement.

5.4.3 Student-Community Liaison Staff

Staff employed by an individual HEI, or jointly with the local authority to promote liaison between students and the wider community can be useful in providing coordination and a drive for activities. One person cannot improve relationships alone, and would need support from community groups, HEIs and their students.

**Cardiff**

Data from the 2001 census showed that 11% of Cardiff’s population were students. 51% of students live in private rented accommodation. Cardiff is home to 3 HEIs:

- Cardiff University (CU)
- University of Wales Institute Cardiff (UWIC)
- Royal College of Music & Drama

It is also possible that students living in Cardiff attend higher education establishment in neighbouring towns, including University of Wales College, Newport and the University of Glamorgan (Pontypridd).

Cardiff University, University of Wales Institute Cardiff (UWIC) and the University of Glamorgan worked jointly with Cardiff Council to produce the Cardiff Student Community Plan. This one plan, which was jointly funded and to be jointly delivered by Student Liaison Officer.

The Student Liaison Officer has been responsible for the development of a new website and distributing information to students on their responsibilities and also for distributing information on the positive activities that students are involved in to improve the community’s perception.

**Oxford Brookes University**

Oxford Brookes University employ a Community Liaison Officer, who works closely with local residents’ associations, responds to complaints and educates students on their responsibilities.

Students are required to sign an agreement when they join the University, which commits to not bringing Brookes into disrepute. The Community Liaison Officer is responsible for enforcing these rules.

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49 [http://www.brookes.ac.uk/students/new/directory/community_advice](http://www.brookes.ac.uk/students/new/directory/community_advice)
5.4.3.1 Community Liaison in Plymouth

A first point of contact between HEIs and the local community can be a really useful way of both responding to local peoples’ concerns, informing students of their responsibilities, and promoting positive activities that students are involved in.

Comments received at the stakeholder workshop suggested that many local residents were not aware of some of the positive activities undertaken by Plymouth students in the local community. A Community Liaison Officer could help to better publicise many of these activities.

Given that most students in Plymouth live in the same area, it is difficult for residents to know which institution students are from. It is therefore suggested that a joint community liaison officer for all Plymouth HEIs might be a prudent approach.

5.4.4 Activities to Promote Cohesion

Activities organised by community groups, HEIs, SUs or local authorities to encourage groups to come together can be really effective in improving cohesion. Best results are likely to be achieved through a partnership approach. Activities should be well planned, or they can be resource-intensive for little perceived benefit.

**Divinity Road Area Residents’ Association (DRARA), Oxford**

DRARA, Oxford Brookes’ local residents’ association work to make students feel welcome to the area by organising a “freecycle” day at the beginning of term, encouraging residents to offer unwanted furniture etc to students moving into the area.\(^{50}\)

**University of Plymouth**

The University of Plymouth is committed to sustainability and social responsibility. They support schools, not-for-profit, voluntary and community groups. The activities undertaken fall into four main groups:

- Widening access and participation for under-represented groups
- Supporting and enhancing community and voluntary sector activity through the involvement of staff and student volunteering
- Staging public events and providing access to University services and facilities for public, community and voluntary group activity
- Determining the social and economic impact of university activity on the community, and providing community and voluntary group access to funded research to support intelligence gathering and future funding proposals.\(^{51}\)

This wide range of activities provides positive benefits to the local community, but, as noted in section 5.3.3.1, it may be possible to promote these activities more widely.

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\(^{51}\) [http://www.plymouth.ac.uk/community](http://www.plymouth.ac.uk/community)
5.4.4.1 Community Cohesion Activities in Plymouth

Whilst there is existing activity by HEIs in Plymouth, it could perhaps be promoted more widely to the local community.

There are also opportunities for local community groups and the City Council to be involved in supporting activities. A partnership approach may be most effective.

5.4.5 Landlord Accreditation Scheme

An accreditation scheme run by one or more HEI to ensure quality of accommodation in the private rented sector can be beneficial to students, local residents and landlords. A scheme can ensure that landlords are willing to take some responsibility for anti-social behaviour by their tenants, and can ensure a good quality of accommodation for students, which may engender a greater sense of pride in taking responsibility for their properties.

Manchester Student Homes

Manchester Student Homes (MSH) is the Universities' only official source of private sector student accommodation. It is owned, managed and funded by the University of Manchester and Manchester Metropolitan University and their respective Students' Unions, and supported by The Manchester College, the Royal Northern College of Music and Salford Students' Union. These Universities and Students' Unions don't recommend or advertise any other private sector accommodation or private sector agents.

The HEIs and Students’ Unions work closely with MSH, and have produced The Manchester Student Homes 'Code of Standards'. This is a compulsory accreditation scheme for landlords and managing agents of student properties.

The Code of Standards covers elements including:

- Provision of information to new tenants (including regarding responsibilities to the local community and on refuse collection)
- Anti-social behaviour
- Community and environment (including waste disposal and fly tipping and ‘to let’ signs)

There is a star system (2 – 5 stars) available for properties reaching a higher standard of accommodation. The Code of Standards is a voluntary scheme, but also sets out some minimum standards required by law.

University of Plymouth

The University of Plymouth has an accreditation scheme for landlords and letting agents. In February 2010 there were 973 student properties registered [53], an estimated 5,000 bed spaces.

The University encourages landlords to comply with a voluntary Landlord’s Charter [54]. This includes a responsibility for Landlords to “endeavour to deal with any anti-social behaviour by tenants that causes a nuisance for other tenants or neighbours”.

5.4.5.1 Landlord Accreditation in Plymouth

The University of Plymouth’s landlord accreditation scheme is to be commended. However, it does not currently accredit sufficient numbers of properties needed for the amount of students seeking private rented accommodation. It is reported that letting agents in Plymouth are aware of rogue landlords and will not provide management services for them [55]. This provides some self-policing of the market.

The University of Plymouth has indicated that they may be willing to franchise out the services of their accommodation office to other HEIs. It is not known whether the other HEIs in Plymouth would be willing to pay for the services. It may be that a scheme similar to Manchester Student Homes should be investigated further to assess its suitability for Plymouth.

5.4.6 Student Information Provision

HEIs, SUs and the local authority can provide information on students’ responsibilities when living in the community; this can be a useful way of encouraging students to take responsibility for their behaviour. Information can also be given on alternative areas of the city where students may choose to live.

University of Bristol

The University of Bristol publishes a joint guide with the Students’ Union [56]; as well as setting out legal and safety guidance, this guide gives useful information about different areas in Bristol, with the aim of encouraging students to think more broadly about where they want to live. This is done using vox pops from students who live in different areas.

The accommodation office also produces a guide to community living, setting out responsibilities of students, and action that can be taken if students breach the rules [57].

Each year, the Students’ Union runs a Housing Roadshow, to give advice to (predominantly first year) students looking to move into the private rented sector. This is followed by the Housing Fair, which is organised by the Accommodation Office and normally attended by City Council officers and other stakeholders, to advise students of their rights and responsibilities, as well as helping them in their search for a place to live.

Information is also provided by a local residents’ group when new students move into the area, Redland and Cotham Amenities Society have a standard letter [58] that their members can use.

[53] University of Plymouth, Briefing on Student Accommodation Strategy, February 2010
[55] As reported at the Stakeholder workshop on 9th August 2010
[57] http://www.bristol.ac.uk/accommodation/prs/community/comliv/
Plymouth

Both the University of Plymouth and Marjon provide some standard information to their students on living in the private rented sector.

Marjon’s ‘Living Out’ booklet provides useful information on students’ legal and other rights, but does not include information on areas to live in or on the responsibilities of living in the community.

The University of Plymouth has ‘a guide to choosing approved accommodation’. This contains a short section on living in the community, which focuses on noise, rubbish and car parking.

The Plymouth College of Art does not have an accommodation office, but does supply some basic information on its website. City College Plymouth simply recommends Unite as an accommodation provider.

5.4.6.1 Provision of Student Information in Plymouth.

Whilst HEIs in Plymouth do provide some information to their students, this is largely practical information on how to find accommodation and rights for tenants. From a review of publicly available information, there are two notable omissions; the student voice and information about living in different areas of Plymouth.

It is likely that some students will respond better to information that comes from their peers rather than what they perceive as “authority”. HEIs in the City may benefit from working with their Students’ Unions. It may be possible to encourage the dispersal of students more widely throughout the city by providing more information about the advantages of living in different areas of the city. There may be advantages to producing much of this information in partnership, as there will certainly be a cross-over across HEIs.

5.5 A Joined-up Approach

In exploring many of the possible management interventions, we have discussed the potential benefits of a partnership approach. An overarching partnership to deliver a number of management interventions could reduce duplication and encourage a more integrated approach.

Brighton

Brighton and Hove City Council have a Strategic Housing Partnership Working Group, which includes representatives from both the University of Brighton and the University of Sussex.

58 http://www.rcas.org.uk/student_leaflet_version_2_dec06.pdf
59 http://www.marjon.ac.uk/facilities/accommodation/livingoffcampus/Living%20out%20booklet.docx
60 University of Plymouth Student Accommodation Office, A guide to choosing approved accommodation, http://www.plymouth.ac.uk/files/extranet/docs/ACC/guide%20to%20choosing%20approved%20accommodation%202010.pdf
Academics from the University of Brighton department of Geography led the development of a Student Housing Strategy\textsuperscript{61}. This is reportedly the first in the UK, and sets out four strategic goals; effective management & support, using an area-based approach; development of purpose built student accommodation; to work collaboratively and; to monitor effects of the strategy. There is an action plan containing 40 actions, with partners identified for delivery in each case.

### Cardiff

In 2006 Cardiff City Council brought together all of the HEIs with an interest in the City to develop a Student Community Plan\textsuperscript{62}. This plan contains actions under a number of headings, with lead partners identified for each action, and further research identified as an action, where required. There are actions specifically to address car parking, noise and waste and examples of current good practice as well as future actions.

### Bristol

As a result of a campaign initially run by the University of Bristol Union, a website was developed with partners including both universities, the City Council and Safer Bristol partnership a website was developed: http://www.bristolneighbours.com/

There is also a Community Liaison Group, which is facilitated by the University of Bristol, and includes the University of Bristol (UOB) and University of the West of England (UWE), Student Union officers from UOB and UWE, local and UOB police, Bristol City Council officers, local ward councillors and local residents’ group. This group meets on a 6 monthly basis to discuss issues arising, including transport, waste and noise.

### 5.5.1 Partnership Working in Plymouth

Any management interventions are likely to be better co-ordinated if there is a group of partners responsible for delivering them, and ensuring that any approach is joined up. As the most significant potential partners, it is suggested that any such approach should be led by Plymouth City Council or the University of Plymouth.

A joined-up approach will also help to ensure that interventions are linked, and that information can be backed up by enforcement.


6 Recommendations and Conclusions

It is unlikely that one intervention alone be able to transform the issues surrounding the concentration of students in the Mutley and Greenbank area of Plymouth. A wide range of knowledge and perspectives is likely to be required to make changes successfully. Therefore, a group of partners from across the city may be required in order to ensure joined-up delivery of the possible interventions.

Some of the recommendations set out below will have an impact solely on student accommodation, whereas others will have a broader effect on HMOs more generally. A combination of the two will be important.

6.1 Planning Policy

Recommendation 1: Positive policy for purpose built accommodation

It is suggested that Plymouth City Council might want to consider adopting a positive policy in the Sustainable Neighbourhoods DPD (or elsewhere) to encourage the development of purpose-built student accommodation. This will alleviate some of the pressure on the private rented sector, will allow the University of Plymouth to fulfil its desire to provide accommodation for all first year students, and will cater for a growing number of international students in the city.

There are existing policies in the City Centre Area Action plan that specify areas that would be appropriate for development of student accommodation. It is therefore suggested that a policy that sets out site selection criteria and requirements might best fit Plymouth’s needs. This would reflect existing policies in the Core Strategy, and might include the following criteria:

1. Sites should be easily accessible to the University and college campuses by walking, cycling or public transport

2. High density developments should be sited in locations where this is compatible with existing developments and initiatives, and where retail facilities are within walking distance.

3. Car parking standards should be met, and a green travel plan developed to ensure that proposals should not lead to an increase in on-street parking in the surrounding area.

4. Proposals that can demonstrate a positive regeneration impact in their own right will be given preference over other schemes.

5. Proposals should be designed to be safe and secure. Consideration must be given to increased informal surveillance or other measures to contribute to crime prevention. Further detail can be found in Policy CS34.

6. Accommodation should not have an unacceptable effect on residential amenity in the surrounding area through increased noise, disturbance or impact on the streetscene either from the proposed development itself or when combined with existing accommodation. Further detail can be found in Policy CS34.

7. Provision and management of waste disposal facilities will be planned within the development at an early stage.
8. Proposals will need to include a management plan.

Recommendation 2: Threshold Approach

It is suggested that a ‘Threshold Approach’ policy is also adopted across Plymouth. Twenty percent is the most commonly used threshold by other authorities, and given the current distribution of student housing in Plymouth, it is suggested that this would be the most appropriate threshold here too. Based on a review of policies from elsewhere, possible policy wording is set out below:

Certain types of development will not be permitted where over 20% of households within a 100 metre radius of the application sites fall within one or more of the following categories:

- Exempt from paying Council tax because they are entirely occupied by full time students [n.b. this could be updated on an annual basis, halfway through the academic year]
- Recorded on Private Sector Housing's database as a licensed HMO.
- A property benefiting from C4 or sui generis HMO planning consent

Where evidence can demonstrate that there are shared houses within 100 metres of the application site which do not fall within the categories above the Council will include these.

The following restrictions will be imposed on development in those areas:

a) Conversion of C3 dwellings to C4 or sui generis (Houses in Multiple Occupancy) will not be permitted;

b) Permission will only be granted for extensions to Class C3 dwellings where there is evidence of the property being occupied, or intended for occupation, by students, where:

   i. The proposal would not unacceptably reduce family housing stock, in terms of both quantity and variety;
   
   ii. There would be no unacceptable effects on neighbours’ living conditions including through increased activity, or noise and disturbance, either from the proposal itself or combined with existing similar accommodation;
   
   iii. The proposal would improve the quality or variety of the stock of student housing
   
   iv. The scale and character of the proposal would be compatible with the surrounding area;

   c) The Council will impose conditions or seek a Section 106 agreement on new houses and flats to prevent their uncontrolled occupation by students

   d) The development of new houses as C4 dwellings or sui generis (HMOs) will not be permitted.

It is suggested that it would be the responsibility of the applicant to provide data on the % of properties in HMO use in order to comply with the requirements of this policy.

Some other local authorities include purpose built student accommodation in assessing their threshold. However, consultation in Plymouth suggests that a more
flexible approach is taken especially in locations that are predominantly non-residential, such as the city centre and university campuses.

**Recommendation 3: Article 4 Direction**

Many local authorities have expressed disappointment at the proposed introduction of permitted development rights for the change of use from C3 (dwelling house) to C4 (HMO). Local authorities can choose to overturn this use of permitted development with the introduction of an Article 4 Direction. However, this means that local authorities either have to give 12 months notice or are liable to pay compensation where a planning application is refused, that would have previously been allowed under permitted development.

It is suggested Plymouth City Council should further consider introducing an Article 4 Direction to strengthen the recommended policy framework, providing 12 months notice to avoid compensation payments. To reflect the threshold approach, this may be most effective if applied to all neighbourhoods where there are currently 8% or more student or HMO dwellings and adjacent neighbourhoods as a buffer zone. The recommended area that should be covered by an Article 4 Direction is shown in Figure 2 (Para 5.1.3.1).

**6.2 Licensing**

Additional and/or selective licensing will have staff resource implications. It may also be considered that currently, licensing in effect diverts resources into those properties that are in relatively good condition when there are HMOs in much poorer condition across the city that are not currently being dealt with because they are not subject to licensing. The City Council will therefore need to consider the best use of limited resources and may choose to target the areas of worst housing for any additional and/or selective licensing rather than the Mutley/Greenbank area where the standard of accommodation is in general better than some other areas in the city. Any action is likely to emerge as part of the new Housing Strategy, which is being developed for the period 2011 – 2016.

It is recommended that the additional licensing scheme in Oxford is observed to understand the impact that it has on student housing in the city and how these lessons might be transferable to Plymouth.

**6.3 Management Interventions**

There are a number of management interventions that could have a positive impact on community cohesion, probably more than are explored in this report. It is suggested that an overarching group is set up to discuss possible approaches. This is likely to need to be led either by the University of Plymouth or Plymouth City Council. Further discussions will be needed to understand the commitment and resources that different organisations in the city are willing to invest.

A joined-up approach will also mean that education campaigns can be followed by an increase in enforcement measures.