

APPENDIX 1

The Policy and Policy Justification

Warwick District Council

Policy for HMOs & Student Accommodation

Consultation Draft

June 2013

POLICY FOR HOUSES IN MULTIPLE OCCUPATION (HMOs) AND STUDENT ACCOMMODATION

1 Purpose of the Policy

- 1.1 The main purpose of the policy is to control the concentration of HMOs, including student accommodation, in certain parts of the District and to ensure that other such concentrations do not occur elsewhere. Existing concentrations in parts of south Leamington have led to a significant loss of amenity for more settled residents. The policy also aims to ensure that proposals for HMOs and Student Accommodation include satisfactory provision for refuse storage and access to public transport.
- 1.2 In April 2012, an Article 4 Direction was brought into effect in Leamington Spa, the effect of which was to remove permitted development rights for changes of use from dwellings (use class C3) to small HMOs with 3-6 unrelated occupants (use class C4). This policy will be used to determine such applications as well as all other applications for HMOs and student accommodation. This will ensure a common approach is applied to all such uses.

2. The policy

Planning permission will only be granted for Houses in Multiple Occupation, including student accommodation, where:

- a) the proportion of dwelling units in multiple occupation (including the proposal) within a 100 metre radius of the application site does not exceed 10% of total dwelling units; and
- b) the application site is within 400 metres walking distance of a bus stop; and
- d)adequate provision is made for the storage of refuse containerswhereby -
 - the containers are not visible from an area accessible by the general public, and
 - the containers can be moved to the collection point along an external route only

Exceptions to a) may be made where the application site is located:

- i) on the campus of the University of Warwick or Warwickshire College or;
- ii) on a main throughfare in a mixed use area where the proposal would not lead to an increase in activity along nearby residential streets (for example, by way of pedestrian movements between the application site and the town centre or car parking)

3.0 Supporting Information for Applicants

Definition of an HMO

- 3.1 A House in Multiple Occupation includes a house or flat which is occupied by 3 or more unrelated people who share an amenity such as a kitchen, lounge or bathroom. It includes a range of different types of accommodation such as bedsits, shared houses, staff accommodation, student cluster flats and halls of residence. The legal definition is contained within Part 7 of the Housing Act 2004. Further information is available on the Council's web site:

<http://www.warwickdc.gov.uk/WDC/Housing/Private+housing/Multiple+occupancy+homes/default.htm>

The Article 4 Direction (Small HMOs)

- 3.2 The Article 4 Direction in respect of small HMOs applies in Leamington Spa wards only. It means that planning permission is required for a change of use from a single dwelling (Use Class C3) to a small HMO (Use Class C4). Small HMOs in Use Class C4 are defined as dwellings occupied by between 3 and 6 unrelated people sharing. In other areas of the District, planning permission is not required for changes of use from a family dwelling to a small HMO (Use Class C4). However permission is always required if the change of use is to a house shared by more than 6 unrelated people.

Applying the 100m Radius Test

- 3.3 In implementing the 100m radius policy, the Council will supplement its own information with an area survey. This will ensure that the information is up-to-date. Buildings converted into self-contained flats will not be counted as HMOs unless the individual flats are occupied by 3 or more unrelated people. However buildings which have been converted into a mix of self-contained and not self-contained flats will be counted as HMOs.
- 3.4 The exceptions to the 100m radius policy will allow larger developments of HMOs or student accommodation where they are located in mixed use areas on main throughfares. In these locations there is less likely to be an adverse impact on local residential amenity, provided the route

between the proposal and the town centre does not pass through a residential area.

Distance from a Bus Stop

- 3.5 Most urban locations within the District are close to a public transport route. However, it is necessary to ensure that accommodation is within a reasonable distance of a bus stop because occupants of HMOs and student accommodation are more likely to depend upon public transport. This is particularly the case in respect of Warwick University students because the University discourages students from taking cars onto the campus.

Refuse Storage

- 3.6 The satisfactory storage of refuse is an important element in any HMO proposal. The Council's guidelines for refuse storage include details of the recommended sizes of containers. These are set out below:

Provision of Refuse Containers for Standard Houses containing Adults		
Size of Household (No of Adults)	Size of Grey Bin (Litres)	No of Grey Bins
1-3	180	1
4-5	240	1
6-8	180	2
>8	240	2

- 3.7 Bulk containers are provided for flats, assuming 90 litres per flat per week. In the case of blocks of more than 8 flats, it is recommended that the Co-Mingled AWC scheme is used.
- 3.8 Proposals for new, purpose built accommodation and changes of use will be required to include well located storage facilities for refuse containers of a size recommended above. This will ensure that all refuse can be adequately contained without impacting on general amenity, with the ability to move the containers to the collection point without the need to pass through a dwelling.

Other Guidance: Planning

- 3.9 Applicants should also have regard to relevant Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG):

Vehicle Parking Standards SPD:

<http://www.warwickdc.gov.uk/WDC/Planning/Planning+policy/Local+Development+Framework/Supplementary+Planning+Documents/Parking+Standards+in+New+Development.htm>

Sustainable Buildings SPD:

<http://www.warwickdc.gov.uk/WDC/Planning/Planning+policy/Local+Development+Framework/Supplementary+Planning+Documents/Sustainable+Buildings+SPD.htm>

Open Space SPD:

<http://www.warwickdc.gov.uk/WDC/Planning/Planning+policy/Local+Development+Framework/Supplementary+Planning+Documents/Open+Space+SPD.htm>

Residential Design Guide SPG:

<http://www.warwickdc.gov.uk/WDC/Planning/Planning+applications/Submit+a+planning+application/Residential+Design+Guide.htm>

Other Guidance: Housing Management & Licensing

- 3.10 The Management of Houses in Multiple Occupation (England) Regulations 2006 impose duties on persons managing HMOs (3 or more unrelated persons, any number of stories). They require the maintenance of the structure, fittings and fixtures of common parts and living accommodation, both internal and external, and the maintenance of the water supply and drainage, gas and electricity.

<http://www.legislation.gov.uk/ukxi/2006/372/contents/made>

- 3.11 The Housing Act 2004 requires HMOs consisting of 3 or more stories and with 5 or more persons to be licensed with the local authority. The local authority will need to be satisfied that:

- the licence holder/person managing the property is fit and proper;
- the management arrangements are satisfactory; and
- the property is capable of being made suitable for occupation by a specified number of persons.

Further information is available on the Council's web site:

<http://www.warwickdc.gov.uk/WDC/Housing/Private+housing/Multiple+occupancy+homes/>

- 3.12 Universities UK has produced a Student Accommodation Code of Practice which landlords can join. This is applicable to large developments of student accommodation. Information about the Code is available here:

<http://www.universitiesuk.ac.uk/aboutus/AssociatedOrganisations/Partnerships/ACOP/Pages/default.aspx>

4 Justification for the Policy

National Planning Policy Framework (NPPF)

- 4.1 The NPPF includes the aim to “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”. Further, planning should “enhance and improve the places in which people live their lives” (paragraph 17).
- 4.2 Paragraph 56 also refers to the need to make places better for people. This includes “safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion”.
- 4.3 The NPPF states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation (paragraph 157).

Rented Accommodation and HMOs in Warwick District

- 4.4 Warwick District has a relatively high proportion of dwellings which are privately rented. The 2011 Census revealed that in the District 17.9% of the stock was privately rented compared with 14.1% in the county. Nationally, the District is ranked 73 (out of 326 English local authorities) in terms of the percentage of privately rented homes. The District has low economic activity rates for the under24 age group and a relatively young population structure with higher than average numbers in the under 35 age groups. This is partly explained by the numbers of full-time students living in the District but also demonstrates a need for private rented housing for younger age groups unable to enter into owner occupation.
- 4.5 A significant proportion (about 15%) of the District’s privately rented stock comprises Houses in Multiple Occupation (HMOs). There are about 1,600 known HMOs in the District and a possible further 300. The majority of HMOs (93%) are shared houses and about 81% are shared student houses. The 2011 Census showed that the District ranked 31 for the proportion of student households. The following table shows the types of HMOs in the District.

HMOs by Type

Type of HMO	No	% Total
Student Shared Houses	1,319	80.9
Other Shared Houses	198	12.1
Bedsits	70	4.3
Staff Accommodation	32	2.0
Other	6	0.4
Student halls of Residence	5	0.3
TOTAL	1,630	100.0

Source: Warwick District Council 2013

- 4.6 About 91% of HMOs in the District are located in Leamington Spa, with 4% in Warwick and 4% in Kenilworth. Within Leamington Spa, HMOs are heavily concentrated in the south and central parts of the town. The two wards of Brunswick and Willes together contain 65% of HMOs.

Location of HMOs by Leamington Wards

Ward	No	%
Brunswick	536	37.6
Willes	390	27.4
Clarendon	239	16.8
Milverton	173	12.2
Manor	54	3.8
Crown	32	2.2
Leamington Spa	1424	100.0

Source: Warwick District Council 2013

See Maps in Appendix 3.

The Issues

- 4.7 The concentration of HMOs and student accommodation in parts of south and central Leamington Spa has in recent years impacted upon the amenities of more settled residents. Research in connection with the Article 4 Direction (see Appendix 2) identified a number of negative issues which were largely a result of the imbalance caused by:
- a relatively large proportion of young, single people with student lifestyles which conflict with the lifestyles of more settled residents; and
 - a relatively large proportion of privately rented accommodation, with short term tenancies, which often leads to a lower standard of upkeep of property and the loss of a sense of belonging within the community.
- 4.8 Where HMOs are not concentrated, there is less of an issue. The issues are not always related directly to the occupants themselves but may be a result of the concentration of young, single people or privately rented accommodation; or of a high population density in areas of smaller

terraced homes. Houses occupied by students or other young people are more likely to be a target for burglary because there is less attention to security and the houses contain more equipment, such as lap tops, than a single family home.

4.9 The main problems which are created within communities where there is a concentration of HMOs include:

- noise and anti-social behaviour, particularly late at night and in the early hours of the morning
- increased crime
- negative impact on the physical environment, including inadequate attention to waste disposal
- lower levels of community involvement and pride in the area
- impact on local services
- pressure on spaces for on-street parking
- reduction in the stock of lower priced housing suitable for first-time buyers

4.10 The three issues commonly cited by residents are noise and anti-social behaviour, rubbish on the streets, and property management/maintenance issues. Occupiers of HMOs are more likely to be the victims of crime, partly due to inadequate attention to security in the home but also because they are more likely to be on the streets late at night. Incidents of crime, such as burglary from dwellings, vehicles and people, are higher in areas where HMOs are concentrated. Noise and anti-social behaviour takes place mainly outside and on the street and also affects residents along streets between the town centre and areas of concentration. Appendices 2b and 2c provide further information on levels of anti-social behaviour, crime and complaints about noise and refuse.

4.11 The Council has, for a number of years, worked with the University (Accommodation Service and the Student's Union), Warwickshire Police and landlords to try and resolve issues when, and before, they arise. This has produced a number of successful initiatives. All parties are aware of the issues and work together to resolve them. However, the short term nature of student tenancies means that each new academic year tends to bring new tenants with whom the authorities, and more settled residents, must re-engage. Thus, although much is being done by the various parties, the problems are unlikely to be completely resolved.

4.12 The Council recognises that HMOs play an important role within the District's housing stock and it is not the aim of the policy to reduce the overall numbers or restrict further such uses. Further, there are positive effects of student populations and young people, in particular the contribution towards the local economy in terms of spending power, a part-time and seasonal workforce and a potential graduate workforce.

How the Policy will address the Issues

4.13 The policy aims to address the following issues:

- the concentration of HMOs and student accommodation
- inadequate refuse storage
- on-street anti-social behaviour

4.14 The application of the 100m radius rule will ensure that issues such as anti-social behaviour, increased crime, refuse on streets and parking will not worsen in areas which already have a significant proportion of HMOs. It takes into account the fact that the average household size of an HMO is approximately double that of non-HMO dwellings. Exceptions to the rule may be made where the application site is located along a main road, in a mixed use area, provided the route to the town centre is not along quiet residential streets. This will address the issue of street noise late at night, particularly during mid-week evenings when “student nights” are more likely to be held in town centre clubs and pubs.

4.15 The policy requires adequate refuse storage facilities appropriate to the size of the household to ensure that refuse containers do not overflow and that there is adequate space for their storage.

4.16 The requirement for properties to be within 400 metres walking distance¹ of a bus stop is included because, in the case of students, Warwick University discourages students from taking cars onto the campus and access by bus will in most cases be the only option. Warwick University campus is some 8 miles from Leamington Spa so cycling will not be a realistic option for most people.

5. Monitoring

5.1 The Council will monitor the number and location of new HMOs as well as the Housing Register to ensure that the policy is not, either, leading to new areas of potential concentrations of HMOs or leading to a shortage of HMOs for younger people who cannot afford self-contained accommodation.

¹ Chartered Institute of Highways and Transportation “Guidelines for Planning for Public Transport in Developments”

APPENDIX 2

Background Information

APPENDIX 2a

Article 4 Direction: Issues identified

The following is a summary of the situation as highlighted by the various sectors of the community with an interest in HMO's in the District in 2010.

The University of Warwick Accommodation Office & Students Union

- Most first year students live on campus but since 2009 the University has been unable to guarantee accommodation to all first year students
- The university considers that most students will want to live independently, within local communities, after the first year and that this is a valuable part of the wider experience of going to university
- Most students choose Leamington above Coventry because it has a good range of suitable housing close to shops, bars, other student housing and public transport to the University
- The University manages about 100 shared houses on behalf of landlords and this makes it easier to address any local issues that may arise. The university is continually seeking good quality accommodation off campus
- Private providers of student accommodation have moved into the market recently and these provide en-suite accommodation with cleaning and security. However these are not popular with students themselves, particularly after the first year, but are popular with parents. The university does not see these as the way forward or as a substitute for shared houses/ flats. However small developments of student bedrooms with shared living accommodation (but no cleaning or security) are popular with students
- There are a lot of misconceptions about students which do apply to a minority but by no means the majority. These include mismanagement of refuse, noise and the perception that all students own a car
- Two years ago the Students Union set up the Leamington Working Group which provides a link between the community (e.g. south Leamington) and the University. This gives local people a contact at the University or local Council if they are experiencing problems with students/ student housing. The relevant authority is then able to address the situation
- There are about 12 voluntary student reps in south Leamington who act as “eyes and ears” in different streets to try and resolve or report potential problems and advise students. The Facebook group has 1,200 members and this is an effective means of exchanging information
- The university produces pamphlets and leaflets to give to students with advice on issues such as recycling and security. It is currently working on a pack to hand out to letting agents to give to students on taking up a tenancy – this will include security, waste and gas safety
- The Students Union is encouraging students to get involved in local communities. In March this year a group of students got together to tidy up the Eagle Street Rec and in June a “Keep Leamington Tidy” group collected waste for recycling at the end of term

- Some students stay on in the District following graduation and this contributes to the knowledge skills of the population

Students (Warwick Students Union Survey 2010)

- The safety issues identified were house break-ins, intimidation and muggings
- Areas students wanted to avoid at night were the area around Tachbrook Road; the canal; High Street; York Way; the junction between Tachbrook Road and Brunswick Street.
- Only 17.5% of students identified an issue with neighbours. The complaints from neighbours were mainly about noise, noisy gates, drain blockages & untidy gardens
- Landlords were ranked 2 (out of 1-5 ;where 5 =good) for resolving issues
- Travel was a major problem particularly getting a space on the bus & difficulty in parking. Most were aware of the car sharing scheme but only 28% use it.

Community (Local Member, local resident& representations on Union Road application)

- “Studentification” can lead to a change in the character of an area. Small, low cost homes which would have been suitable for young couples/ families are disproportionately occupied by students. This leads to (a) a fall in school role, e.g. Shrubland Street; (b) an unbalanced community with large proportion of young adults living away from home for the first time; (c) a transient community where people stay for a short time and disappear over the Summer ; and (d) a higher proportion of private rented homes with greater incidences of lower standards of maintenance
- In south Leamington there are community safety issues with higher levels of house break-ins and late night noise and brawls
- The student lifestyle is different from that of working people – different hours, more free time, more socialising. Where concentrated this leads to conflicts
- Many student houses are terraced houses and where adjacent to family homes this can seriously impact on the amenities of neighbours
- For landlords, there is a good return on student housing so it is a good investment. This takes low cost housing out of the market for young couples/ families and first time buyers
- Objections to the Union Road application included issues such as parking; waste; character of the area; noise; and precedent for more student houses
- Late night disturbance doesn’t just affect those living in student areas, but also those living on the route between student areas and pubs/clubs.
- Where property is rented on a short term basis, the residents are less likely to be interested in getting together to resolve local issues or to take an interest in maintaining the front gardens
- In areas with a high concentration of students, there can be a restructuring of local shops and services to suit the lifestyles of the predominant population
- HMOs are generally occupied by more people than would be the case in a family house so that in streets with a concentration of HMOs there are greater problems

associated with parking, litter and overflowing refuse bins and proportionately more noise impacting on neighbours

The Landlord (Tara & Co - Letting Agent)

- The quality of student housing has improved and students are now more discerning
- Students prefer living with other students in a house with a garden and close to other student accommodation
- Rents range from £60 - £90/week
- Letting houses to students gives a good return to landlords – students tend to be better tenants than other sections of the community
- The company holds focus groups with tenants where issues are discussed – as far as students are concerned the main issues are standards, repairs and maintenance, and landlords
- Refuse is a problem
- The leafleting of new tenants works well and this could be extended to be on a termly basis rather than just at the beginning of the academic year.

Public Services

- Community safety is an issue in areas with high concentrations of students. Student housing is a target for house break-ins because students can be less security conscious and have desirable possessions (e.g. laptops, i-pods, i-phones etc)
- Typical offences include thefts from vehicles and dwellings, cycle thefts, common assaults, criminal damage and public order
- There is evidence of a reduction in incidences of crime in south Leamington since October 2007. Further analysis of the statistics is required
- There is more late night activity in student areas – female students are targets for harassment and males for fights
- South Leamington is an area of relatively high deprivation and there are issues with drugs and alcohol
- There are higher than average call out rates for the fire and ambulance services
- There are issues with waste, particularly at the end of term/ academic year when student houses are vacated.
- Over the past four years the Council's Environmental Protection Team has received a number of complaints about noise and waste in south Leamington. For example, in Northway where about 45% of the 49 properties are HMOs, there were 21 complaints of which 8 concerned noise nuisance and 4 concerned waste.
- WDCs Private Sector Housing team is able to control licensable HMOs² in terms of management, facilities, repair and fire safety but many student shared houses are not licensable

² HMOs with 3 or more stories and occupied by 5 or more people have to apply for a licence from the District Council. The licence covers matters such as fire precautions, facilities, repair and management.

APPENDIX 2b

Anti-social Behaviour and Domestic Burglary Incidents 2012

Community Forum Area	Population	Total Anti-Social Behaviour Incidents Jan to Dec 2012	Rate Per 1,000 Population
South Leamington	19,324	1184	61.27
Warwick	30,114	1221	40.55
North Leamington	29,401	1650	56.12
Whitnash	9,572	174	18.18
Kenilworth	25,308	410	16.20
Rural East	9,736	157	16.13
Rural West	14,193	169	11.91

Community Forum Area	Households	Total Domestic Burglary Offences Jan to Dec 2012	Rate Per 1,000 Population
South Leamington	7,684	135	17.57
Warwick	13,348	82	6.14
North Leamington	13,276	168	12.65
Whitnash	3,848	38	9.88
Kenilworth	10,518	42	3.99
Rural East	4,091	40	9.78
Rural West	5,914	44	7.44

*Source: Warwickshire Police, Crime Information System & STORM Incident System
Census 2011 - Warwickshire Observatory - Population and Household stats*

NB North Leamington Community Forum Area includes the Town Centre

Appendix 2c

Environmental Protection Complaints in South Leamington 01/10/10 to 31/12/12

Street	Total Complaints	Noise Nuisance Complaints	Refuse Complaints
Tachbrook Road	54	12	6
Clemens Street	13	3	3
Brunswick Street	56	13	12
Wise Street	7	5	0
Crown Terrace	0	0	0
Gas Street	5	2	0
Priory Street	1	1	0
Ranelagh Terrace	12	3	2
Charlotte Street	5	1	0
Claremont Road	17	13	1
St Georges Road	2	0	1
Charles Gardner Road	22	16	0
Shrubland Street	10	2	2
Tachbrook Street	27	15	5
Llewellyn Road	10	4	2
The Close	6	1	0
Northway	8	7	0
Alexandra Road	21	3	1
Eagle Street	17	2	0
East Grove	3	0	0
Grove Place	16	6	0
Clarence Street	0	0	0
New Street	19	9	4
Gordon Street	16	4	7
Russell Terrace	21	10	2
Plymouth Place	11	2	1
Forfield Place	4	1	2
George Street	13	6	0
Church Street	28	3	1
Regent Place	18	8	2
Gloucester Street	3	2	0
Bath Street	22	1	4
Clinton Street	0	0	0
Radford Road	37	7	3

Source: Warwick District Council

Appendix 2d Issues Consultation

1. Consultation on the Issues prior to Policy Development

1.1 Officers have consulted further with residents, landlords, Councillors and other Council departments prior to the development of this policy. This has included:

- Meeting with residents
- Presentations at Landlords Forum
- Questionnaire to landlords
- Discussions with Warwick University and Warwickshire College Accommodation Offices
- Meetings with Councillors
- Meetings with Officers from other Council Departments such as Private Sector Housing, Community Safety, Environmental Health, Economic Development and Licensing.

2. Consultation with Residents

2.1 A meeting with residents from south Leamington, and local Councillors, was held on 20th December 2012. The residents highlighted the following issues:

- loss of low-priced family homes in the area so families have to move away from Leamington to cheaper areas;
- rent levels for student houses are high and unaffordable for families
- high proportion of students impacts on house prices
- once a house is let to students, it stays as a student let
- student lets impacts on support for local school
- people on short term lets have less commitment to an area
- problems with property maintenance issues such as sewerage and drains which are slow to be fixed
- refuse
- noise, particularly at night and in the early hours, including shouting in the streets
- location of habitable rooms in relation to neighbouring bedrooms
- general imbalance in the area between students and residents
- parking at weekends
- HMOs have higher percentage of drivers
- any policy should seek a balance between the social, economic and environmental aspects

3. Consultation with Landlords

3.1 Planning Officers regularly attend the Landlords Forum and update them on work to date on the Local Plan, Warwick Town Centre Plan, the Article 4 Direction and the HMO Policy. At the meeting on 30th October 2012 a short Issues Questionnaire was distributed. There were few responses, but the general view of landlords was that student accommodation was beneficial to Leamington in the following ways:

- investment in the area in terms of modernisation of properties;
- support for local shops, pubs and take-aways;
- increase in the vitality of Leamington town centre, particularly the evening economy

4. Consultation with Warwick University & Warwickshire College

4.1 Warwick University (Accommodation Office, Welfare & Public Affairs) has very close links with the District Council and meets on a regular basis with WDC Officers from Community Safety, Licensing, Environmental Health as well as Warwickshire Police.

4.2 Warwick University currently have 6,528 purpose built rooms on the campus which are let to students, but 200 of the older units will be demolished next year. In addition, they manage a further 1,861 bed spaces in Coventry, Kenilworth and Leamington. Around 6,000 full-time undergraduate students live in private accommodation across Coventry, Kenilworth and Leamington. The University is unable to say whether there is currently sufficient accommodation (no student is ever homeless) but they will be building further accommodation on the campus as the funds become available. There is currently an outstanding outline planning permission for a further 167 cluster flats within the campus in Warwick District.

4.3 The University takes complaints about anti-social behaviour by its students very seriously and works closely with local agencies and the Students Union to address these, and other, issues.

4.4 Warwickshire College has purpose built halls of residence on site which provide 92 en-suite rooms and a further 24 rooms in an older halls of residence close to the college. Both are normally fully occupied. A private halls of residence consisting of 11 rooms is also used by college students. A total of 41 students live with host families. The majority of students who require accommodation are international students from the Far East and Middle East. Demand for accommodation from these students is high and the requirement for credit checks from private landlords makes finding accommodation more difficult.

5. Consultation with Councillors

- 5.1 A meeting with Councillors was held on 19th November 2012. Those present supported an approach which tackled the concentration of HMOs by way of a 100m radius policy. A further meeting was held with the Members Policy Review Group on 10th April 2013 where Members considered a draft policy and supported the approach.

6. Internal Consultation

- 6.1 A series of meetings was held internally with Officers from other Departments before finalising the Draft Policy. This covered areas such as:

- community safety
- noise and anti-social behaviour
- refuse storage and collection
- licensing for late night opening in the town centre
- impacts on viability and vitality in the town centre
- impact of the policy on general availability of HMO accommodation
- management and licensing of HMOs

- 6.2 The approach to controlling the concentration of HMOs was supported provided that the policy was properly monitored to ensure that there was no adverse impact on the general availability of HMO accommodation (particularly for those on housing benefit).