

## **Comments by the Nottingham Action Group on HMOs on Planning Application 13/00865/PFUL3: Development of Seven Four-Storey (HMO-Style) Student Dwellings**

The application is to develop what is basically a triangular area, at present used as a car park, sited between Castle Boulevard and the Nottingham Canal in order to provide seven, four-storey townhouses. These are intended to provide 84 rooms in total for rent to students.

From the time of its formal constitution in February 2004, one of the medium-to-long term aims of the Nottingham Action Group on HMOs (NAG) has been two pronged:

1. To discourage further development of HMOs in neighbourhoods where concentrations of this type of accommodation have resulted (or are likely to result) in environmental and other problems, many of which are allied to poor management, breakdown in social capital, a demographic mono-culture, and a transient mentality which, taken together, have resulted in community imbalance and unsustainability.
2. To encourage the return of HMOs of all sizes to family (C3) use (either as a result of purchase by owner-occupiers or families wishing to rent their homes) and thus facilitate the restoration of balance and sustainability to the affected neighbourhoods

Whilst students are not the only group which uses HMO-type accommodation, the recent rapid expansion in student numbers at both of Nottingham's universities has been the main driver behind the increase in HMOs, especially in concentrations of HMOs, in certain parts of the City, often (and unfortunately) referred to as 'student areas'. Thus, at least at this time, the NAG's focus is on the provision of student housing

Research conducted into the student market, as well as anecdotal evidence, has highlighted the fact that the majority of students, once their fresher year is over, tend to view the conventional 'purpose build' models, e.g. cluster flats with en suite facilities, as unattractive. Indeed, it is returning students who are the majority users of student-occupied HMOs. Therefore, in order to encourage the return of existing student-occupied HMOs to C3 use, it is particularly important that students are given choices which provide genuine alternatives to HMO accommodation.

The 'Townhouse' concept presented in this application seeks to do just that by replicating the 'selling points' of HMOs which appeal to students, including a non-institutional environment, significantly larger rooms and more social space. As such, the NAG believes it can make at least three important contributions to the student housing market in general:

3. Provide students with a better quality offer of accommodation than that provided by conventional 'purpose build' and, through its energy-efficient build standards, etc. better value for money than the majority of HMOs.
4. Show that it is possible to design student accommodation which is attractive (internally and externally) and, most importantly, versatile enough to be able to be converted into homes for other than students if/when market circumstances and demands change (the 'family townhouse and apartment' options): a much needed model for sustainable and eco-friendly construction.
5. Provide the burgeoning industry in 'purpose built' student accommodation which has sprung up over the past few years, as well as planners, architects and local planning authorities with a yardstick by which to judge potential future developments.

Within the context of the locality, the quality of design and materials of the proposed development will enhance what is a rather drab and nondescript part of Castle Boulevard and hopefully act as a means of improving the quality of future development along what is, after all, one of Nottingham's major arterial routes.

However, there are other factors which weigh against the development, and which have to be considered, the main ones being:

6. The proposed development is in Dunkirk & Lenton Ward which has a disproportionately high number of HMOs, particularly those occupied by students.

7. This relatively small-scale development of itself cannot be expected to result in return of HMOs (C4 and sui generis) to the C3 'family' housing market.

8. In effect, the development, if given permission, will increase the number of HMOs in an area (Lenton) where the concentration is already above the currently accepted 25%.

9. It will result in an increase in student numbers in an already demographically and socio-economically unbalanced ward.

10. It may be seen as setting a precedent for other future student 'purpose built' accommodation developments/redevelopments within Dunkirk & Lenton Ward and other neighbourhoods in wards with similar profiles.

11. As the development is, in essence, seven sui generis HMOs, it is in danger of also setting a precedent for further conversion of C3 homes into C4 and sui generis HMOs in Dunkirk & Lenton Ward and elsewhere.

For the NAG, and taken together, these factors would ordinarily mitigate against the proposed development, and the Group would have no alternative but to strongly argue against planning permission being forthcoming.

However, we believe that there are circumstances peculiar to this site which, when viewed as a whole, tend to mitigate in favour of the development and thus make it one which, in this particular instance, the NAG can, and does, support, i.e.

- the location of the proposed development on a vacant piece of land in need of renewal, and at a distance from other residential properties;
- the proposed strong management and maintenance regimes, as well as measures to prevent tenants from bringing cars to the area contained within the proposal;
- plus the potential contributions outlined in Points 3 to 5, especially the potential for the development's future use to be changed into high quality family townhouses or apartments.

However, there is a caveat. The support of the Nottingham Action Group on HMOs for this application is predicated on the condition that this application, if it is approved by Nottingham City Council, must be viewed as a pathfinder project, not as a gateway for the sort of poor quality, inappropriately designed and located developments which take little or no account of the long-term prospects of tenants and other residents in those neighbourhoods where HMOs are of considerable concern.

The concerns raised in Points 10 and 11 are genuine ones and must be addressed by developers, investors and Nottingham City Council through its Development Control Committee and revised planning policies and strategies relating to HMOs and the future balance and sustainability of our neighbourhoods.

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10 May, 2013