



CCC Consultations <consultations@canterbury.gov.uk>

Comment on Draft Local Plan Policy DM3

1 message

Robert Benfield [REDACTED]

16 January 2023 at 13:13

To: consultations@canterbury.gov.uk

Policy DM3 Housing in multiple occupation (HMOs)

I write in strong support of this policy. Since its introduction, the Article 4 Direction has worked well in its aims to maintain an appropriate area housing mix and to safeguard the character of local communities.

The average occupancy of HMO properties is about double that of single-household properties. This means that the proportion of HMO occupants in a population substantially exceeds the proportion of HMO properties in that area. The National HMO Lobby in its 2008 report "Balanced Communities and Studentification" identified **10% of properties** as the tipping-point from a community which is demographically balanced and sustainable to one which is dominated by HMOs, because it corresponds to approximately 20% of the population. It is good that this is the criterion used in Canterbury, and the use of the proportion of dwellings within a 100m radius of any application property allows the policy to be applied fairly and efficiently.

The high occupancy of HMOs, and increasing levels of car ownership, means that consideration of the level of car-parking that would exceed the capacity of the street is also very important.

The Article 4 policy considers the interests of all demographic groups to maintain sustainable communities, with an appropriate housing mix and orderly markets in both buying/selling and letting/renting property.

It does of course depend on the Council maintaining a completely accurate and up-to-date record of which properties are HMOs. Evidence suggests that there is room for improvement here.

Dr R E Benfield