

STATEMENT ON BEHALF OF THE UNIVERSITY OF BATH

I am here to speak on behalf of my clients the University of Bath, who wanted to take this opportunity to clearly set out its views on this matter, and trusts the Council to take these comments into account when considering the proposal to impose an Article 4 Direction.

The essential value of Houses in Multiple Occupation in terms of meeting the demand for flexible and affordable housing, and in ensuring that there is a balanced and effective housing market in the city, should be given the utmost weight in the determination of whether to implement an Article 4 Direction.

Houses in Multiple Occupation are an essential source of housing for young people in the city including graduates, young professionals, key workers and contract workers, as well as students.

Given current house prices, young people often have a limited choice of housing available to them, and a constraint on the flexible supply of Houses in Multiple Occupation will further marginalise them in the housing market.

Landlords will be discouraged from entering the market, which together with the limitation on the ability to switch between different types of occupier, will inevitably limit supply and result in increased rental costs.

There are also wider economic, social and sustainability factors to consider.

A limitation in the supply of Houses in Multiple Occupation will force young people to reside elsewhere in or outside of the city. That will potentially have a significant effect on the city's economy, not just in terms of the support for local businesses that young people provide, but also in respect of underlying factors fundamental to the city's economy such as graduate retention.

Whilst the University plans to provide up to 2400 new study bedrooms on the campus in the period to 2026, there will still be significant demand from students for HMO accommodation in the city. Many students prefer this form of accommodation, particularly in their later years of study, and should not have their choice of accommodation and location in the city unduly fettered.

There are also concerns that the wider dispersal of students throughout the city, will undermine the University's sustainable transport strategy which is founded on the provision of a rapid and frequent bus service from key student areas in the city to the campus.

The Committee Report highlights that imposition of an Article 4 Direction, requires there to be "exceptional circumstances" and clear evidence of harm. The University does not believe that that has been satisfactorily demonstrated in the Feasibility Report.

Moreover, it is the University's view that the problems often associated with high concentrations of Houses in Multiple Occupation, could and should be controlled by other more appropriate means than an Article 4 Direction.

The problem is commonly not the provision of Houses in Multiple Occupation per se, but how they are managed. The Feasibility Report outlines the opportunities open to the Council in terms of licensing, and there is a clear benefit to using this manner of control in terms of ensuring the quality of HMO provision in the city to the benefit of the wider housing market. The Feasibility Report also refers to other "management measures".

It is the University's view that the Council, with the co-operation of key stakeholders, including the University, should implement these measures to address the concerns that have been expressed in respect of the presence of Houses in Multiple Occupation, before the "exceptional" action of imposing a city wide Article 4 Direction is taken.

These measures would not result in a blanket constraint on the provision of Houses in Multiple Occupation to the severe detriment of the city's housing market, and they also have the added benefit of addressing problems associated with the existing Houses in Multiple Occupation, as well as new Houses in Multiple Occupation.