

David Cameron

We believe that enhanced planning policy will not address the problems associated with inefficient management of HMOs and that the report and feasibility study has provided no evidence to support this. We believe that the issues that exist in communities are rarely about planning, but are about housing standards, communication between stakeholders and community cohesion, and as such planning policy, such as an Article 4 Direction, will not solve the problems that it is hoped to. An increase in planning regulations will inhibit the ability of the housing market to respond to local needs, something that will adversely affect the entire population of Bath.

BaNES currently have powers under the Housing Act 2004 that allow them to address the problems associated with managing HMOs in the city. Point 3.3.5 of the feasibility study states that “with additional resource it would be possible to extend the proactive work done in this area”, which suggests that these powers have not been fully utilised and enforced to tackle the perceived problems. These can be used alongside other initiatives such as the accreditation scheme, which ensures HMOs meet minimum standards, that has been under resourced in recent years.

An Article 4 Direction should only be used in “exceptional circumstances” as defined by the General Permitted Development Order. Exceptional circumstances should only occur when all other options have been tried, tested and deemed to have failed.

The feasibility study 14<sup>th</sup> February 2012 provided information on a number of management initiatives that are either in place in Bath or elsewhere. Whilst these have been included in the feasibility study, no visible analysis on the success of these or reasons why they cannot be tried in Bath have been given. Without this information is it possible to conclude that Bath is in a state of exceptional circumstance with regards to HMOs?