

STREET	POST CODE	PRECIS OF COMMENTS (limited by character spacing availability)
PUBLIC RESPONSES		
St Johns Road	EX1 2HR	I am writing to express concern at what appears to be the uncontrolled impact of multi occupancy housing upon the St Johns Road area. I have lived in this road for 10 years and noticed increasing pressure on parking and anti-social behaviour. A majority of properties sold on the street are converted to HMOs with up to 6 transient adults leading to anti-social behaviour and an unbalanced community. The issue is compounded by absent landlords do not re-invest income to engender a sense of community pride and respect. There is a marked difference in standards of HMOs and owner/occupied properties. Residents parking needs to be extended. The Council do not appear to be taking positive steps to re-address the imbalance of the community. I fear that this imbalance will encourage some longstanding residents to relocate and consequently reinforce this 'ghetto' effect.
St Johns Road	EX1 2HR	Whilst your plan is welcome and would help for the future I have to say that my initial reaction was that this is 'closing the stable door after the horse has bolted'. These measures should have been put into effect ten years ago. Since 1984 the quality of life in this area has consistently deteriorated. There has been loss of amenity (local shops), not enough parking, increases in litter, noise and no physical improvements carried out other than street lighting. What happens is that a vicious circle begins. People get fed up because of these issues and move out. Properties are then bought as 'buy to let', family homes with one car become 4+ students and three cars. As a result I think there are only 2 people living here for any length of time and the situation can only get worse. My conclusion, therefore, is that this is too little, far too late to be of benefit to anyone.
Castle Mount	EX4 4JW	I agree with the proposed approach to resist planning applications for HMOs where the proportion of homes claiming exemption from Council Tax due to entire occupation by full time students exceeds 20%.
Howell Road	EX4 4LG	Appreciate concerns of local residents but strongly oppose any measure that attempts a 'one size fits all' policy. Larger houses in Howell Road have had many uses over the years. Communities change over time and it may not be in the Council's best interest to apply strictures that prevent flexible development with regard to all properties in the chosen area without any consideration of the size of the property in question. Do not want planning laws imposed by those who pupport to speak for the whole community.
Howell Road	EX4 4LN	Urge Council to approve the document. This area is in danger of losing its identity. Important for the wellbeing of the local neighbourhood to keep a balanced social mix thereby maintaining a strong sense of community. Imbalance results in isolation for people living in the few remaining non student properties. Students spend large periods away and empty properties can lead to a locality being transformed into a soulless environment.
Velwell Road	EX4 4LE	Opposed to more students in Velwell Road, they are already all over Exeter and enough is enough.
Velwell Road	EX4 4LE	I do hope that the document will be adopted. I am concerned about the 'domino' effect of developers buying up property. If this continues I fear that the strong feeling of community will be jeopardised.
Velwell Road	EX4 4LE	I am writing to wholeheartedly support your initiative in trying to control the complex issue of HMOs in our ward. The problem has come to a head with the recent move to expand the University's student population enormously. The main concern I have is that more than a small minority of student accommodation in a street can ruin the local community. There are streets in the ward that contain a large proportion of only large family houses. If we want the City to prosper we must have a good bank of such houses in order to attract wealth producing newcomers. The present number of such houses is too small and diminishing as they are converted to HMOs. The ensuing increase in population density stretches any number of services to unsatisfactory levels.
Velwell Road	EX4 4LD	The University has grown significantly and ECC has been supportive of this growth. However what ECC has not succeeded in doing is to plan for the inevitable conflicts that this growth generates. Whilst government has not made the control of HMOs easy, the support for the University has not been mirrored by support for the community by careful and proactive town planning. Consequently, balance between the interests of St James as a community and the University has not been achieved. The issue is the current trend of family housing being converted to HMOs. Illogical that HMO control may be based on a limit of 20% when purpose-built accommodation will obviously add to student population. Suggest amending para 4.1 to 'Whilst purpose-built student accommodation is beyond the scope of this guidance, the planning authority recognise that such development can cause further imbalance in the local community by increasing the percentage of student population in St James. In considering applications for purpose-built accommodation, the planning authority will give significant weight to the changes of balance of population an application may create and to the general impact on the character and amenities of the neighbourhood'.
Velwell Road	EX4 4LD	Approve the document, it goes in the right direction of avoiding excessive concentration of HMOs in St James Ward. The current planning legislation has been a threat to residential diversity and has caused great harm, particularly in some roads where houses suitable for first time buyers have been completely taken over by students. A fair balance of residential houses and HMOs has disappeared in many areas, and those roads that still retain a balance should be protected from further harm.

Velwell Road	EX4 4LD	I give full support to proposed measures to restrain further development of student HMOs in the St James Ward and to limiting future growth in adjacent areas. The previous policy of encouraging students to live close to the University has resulted in swathes of Pennsylvania and St James being developed with student HMOs. It seemed that first time buyers and mature families who wished to live close to the city centre were not worthy of consideration; and an awful lot of quality houses have been lost to developers. A town like Exeter is a precious thing. It has to have residential accommodation to attract a wide range of people, most importantly, entrepreneurs and wealth creators who will animate the science park and future commercial and industrial developments around the City and East Devon. We must welcome the life and jobs that the University brings to the City but the sacrifice of our quality residential areas to developers and the inevitable domino effect leading to the destruction of our communities will hopefully cease when the new regulations are in place.
Velwell Road	EX4 4LD	I fully support an immediate restriction on the changes of use of houses to multiple occupancy where an overconcentration already exists. It is vitally important in any area to maintain a large proportion of residents who have a commitment to the quality of living for all residents - students by their transient nature don't always have such a commitment. A healthy community is a balanced community and when the density of students becomes too great the impact on the community can be quite dramatic. The owners of HMO properties have no tie in to the community. Students rarely take part in neighbourhood and residential groups which are again vital to maintain a community area where people want to live. I would implore the Councillors to take notice of the views of the long term residents to limit further development of HMOs and ensure that the centre of Exeter remains a desirable place to live, work and bring up families.
Velwell Road	EX4 4LD	I fully support the proposals contained within the letter but enforcement must be effective and sustained. There is a very real danger that the areas adjoining the University which are residential become an extension of the University and not a balanced community. As the University continues to develop and expand (we are left in no doubt as to the economic benefits to us and the City) then they should be made to use the considerable land on the campus for student accommodation and not allowed to 'pick off' strategic buildings nearby i.e. Bishop Blackall and Pennsylvania Road. It is not necessary for all students to live adjoining the University - I lived eight miles from the University I attended. Exeter is already a small, congested and very dirty City. Student accommodation should be spread more fairly.
Velwell Road	EX4 4LE	Velwell Road is quiet with a lot of retired people. Students walk home at 1.30am shouting, swearing, laughing at the top of their voices. Example if there are 50 houses, 10 could be rented out and at 6 students per property that is 60 students in a quiet road. No to 20%, one is enough.
Highcross Road	EX4 4NP	Fully support the proposed extension of powers to prevent further increase in HMOs. Local community will be further adversely affected with more students at Bishop Blackall and Tennis Courts. Look at the degradation of Longbrook St and Pennsylvania Road to witness the impact in terms of noise, rubbish collections, urination/vomit in streets plus all too often landlord neglect. This is a small City with a very long housing waiting list, struggling to cope with an influx of students who pay extortionate rents to landlords who do not pay council tax, bearing heavily on full time residents.
Thornton Hill	EX4 4NJ	We strongly object to the blanket policy of A4D being imposed upon the residents in St James. While we understand the student problem needs to be addressed we do not accept that this is the correct means. The way it has been handled is wrong and unfair. Certain streets in St James are now in a situation where one half is residential and the other overpopulated by students. By disallowing those few residents left in the student populated ends to sell to an investor you are in effect trapping them. We do not accept the Council imposing a policy on us which will trap us. If noise becomes intolerable then we need to be able to move but as a large family we would be unable to buy a comparative house. The only sensible, fair and logical solution is not to trample over those of us in this position and see us as mere casualties of policy. We question the legality of what you are doing. It is tantamount to fettering discretion 'The decision maker can assume a policy legitimately but in exercising it must not rule out the merits of individual cases and avoid exercising discretion'. The SPD must include a guaranteed exemption.
Thornton Hill	EX4 4NS	We are delighted that the Council has decided to look at this issue at last. In this area hardly a house has been sold over the last year or more without a developer buying (or trying to buy) in order to convert to an HMO to capitalise on Exeter University's growing student population. Occupation of Thornton Hill is still largely of family houses and there is still little enough noise from student late night parties for this type of occupation to continue, so we very much welcome the proposal to institute a new policy for the St James area. We trust this will mean that the student population will be spread more thinly through the rest of our City, as was done in Cambridge 50 years ago.
Thornton Hill	EX4 4NS	We write in support of the policy. Adoption would be a big step forward in protecting the character of Thornton Hill.
Thornton Hill	EX4 4NN	Very much in favour of the draft SPD. Proposals, when implemented, should do much to improve the relative imbalance between student occupied houses and full time residents.
Thornton Hill	EX4 4NR	We are writing to register our full support for the proposed HMO policy for St James. We are extremely concerned about the changing nature of our community over the past 20 years. The time has come to resist the seemingly relentless buying up of family homes by landlords for buy to let purposes. All communities need to have a balance of permanent long term residents and St James needs the protection that this can provide. We will be extremely unhappy if the Council does not approve the proposal and sincerely hope the measure will be approved.
West Avenue	EX4 4SD	We fully support the Council in its proposal to introduce an SPD limiting the spread of HMOs which changes the character or creates an imbalanced community. The St James Ward has already gone well past this point and neighbouring areas are approaching it. We regret the delay in introducing the Article 4 and believe the Council should have been more proactive at a much earlier stage in managing the effect of the increasing student numbers. We believe the proposed 20% threshold of homes is too low as even at this level there can be almost 50% of student population of a locality. Ten or fifteen per cent would be a more reasonable target. This would take into account the exclusion of purpose-built student accommodation. The Council will have to take great care to monitor the use of existing housing to ensure that there is significant burden of proof for landlords claiming an existing lawful use as an HMO. It is reasonable to include an "unsaleable" clause allowing exemption in exceptional circumstances but the criteria for this will need to be clear and abuse avoided.

Culverland Close	EX4 6HR	I support the policy at 5.4 to encourage the accommodation of students in purpose-built accommodation, however I recognise that there would still be demand for conversions to HMOs. I fully support the proposal at 5.13 and support the proposals shown in App 1 Map. Other solutions suggested could leave local residents isolated in a student community.
Union Road	EX4 6HT	Landlord/occupier (extensive comments abridge) Totally opposed to Art 4. Insufficient thought has been put into the consequences of this action and the contempt you show for the student population. Why is it ok to discriminate against students? Council tax exemptions is a flawed method of counting. The proposal has poisoned the whole area. I am extremely bitter about having to leave a fantastic house I have lovingly renovated over the last 10 years but there is no way I can face being trapped in a house that will be too big for us in the foreseeable future. The University brings vast amounts of money and it is disgusting the way the Council treats students. Thousands of Exeter residents rely either solely or largely on the University to earn a living. Students can make far better neighbours than a lot of other people no screaming babies or barking dogs. There are an unquantifiable number of small HMOs but occupants work and pay council tax. Restricting HMOs will have a damaging effect on low income working people.
Union Road	EX4 6HU	Supports proposal. Neighbourhoods need to be balanced. More student houses mean more cars. More buses needed. Deterioration of natural environment - owners of student houses tend to destroy existing gardens. Liaison officers do their best. Sheer numbers planned by University is a potential future problem.
Union Road	EX4 6HU	We have lived at this address since the mid 80's and raised our family. While we fully understand the intentions of the draft proposal there is something of a horrible irony in these proposals for ourselves as we will find a very significant element of potential buyers excluded from buying our house in the event that we wish to sell. The extent of HMO etc occupancy round here is now so great that the chances of a family purchasing the house already looks increasingly minimal. This causes us great concern and may indeed seriously affect or indeed negate our ability to sell. Would there be any way of allowing exceptional circumstances for residents such as ourselves?
Devonshire Place	EX4 6JA	So much dismay and frustration has been caused to the residents of this ward by the way in which the City Council has stated the intention of listening to the opinions of, indeed consulting with, those members of the community most likely to be affected by proposed changes and then ignoring their serious concerns. For example, Bishop Blackall complex, the flats at 49 Well Street and Stoneman & Bowker to name but three. Most of us back on to Victoria Street and a number face Glenmorrie. We are a through road to the University when the clubs in town close. We are a mixed community. Our relationship with students varies from year to year but is mostly good but, should the number increase further, there will inevitably be resentment. The lack of forward planning to date to mitigate the pressure being placed on the community is constantly discussed. I hope this is the moment when we will see a strong and responsible lead taken by the Council and the beginning of a fruitful two way relationship with anxious citizens.
Devonshire Place	EX4 6JA	Support greater controls over future conversions of family dwellings to small HMOs within the St James area. In DP there are now at least 7 student houses. Some have been bought by parents for their childrens' use while at University and we are not sure how this fits into the category of HMOs. The character of the neighbourhood, not just the street we live in has changed, diminishing sense of community and lack of diversity. An ever changing population with long periods of houses being deserted leaving the area vulnerable to break-ins. Each October brings a new tension - will this intake be ok? This area of the City is being taken over by the student population creating a limited pool of buyers which then becomes a vicious circle until there will be a time when no families will be living in the area.
Elmside Close	EX4 6LP	Mount Pleasant has too many HMOs which has had a detrimental effect of an imbalance in the local community making the lives of residents unpleasant due to noise, rubbish and unbearable behaviour. There is no doubt that the Council should resist planning applications for HMOs.
Elmside	EX4 6LW	We bought our family house in 2007 because it was in an area populated by students and other HMOs and we like the multicultural atmosphere of the area. The HMOs in the area bring a cultural vibrancy which should be celebrated, not prevented. We also bought our house because we wanted to be able to convert it to HMO and let it to students or sharers if the time comes that we need to move away from Exeter (I am an academic). We saw the house as a sound investment which would allow us flexibility in the future. Your policy will profoundly affect this flexibility and our investment. We urge you to rethink this policy it impinges upon our rights to do with our property as we wish and our freedom of movement. If the policy is passed we will find it difficult to sell or let and, if we do chose to sell, the property price will be affected. This is grossly unfair. We would seek legal advice on what we deem a blight on our property. We would seek compensation.
Rosebery Road	EX4 6LT	Occupier living at property. I am concerned about the negative impact that the Article 4 in its current form will have on a small number of residents who live in areas of Exeter that are already heavily populated by HMOs who will be effectively trapped by the restrictions as they would not be able to sell their houses. There has been some recognition of this issue as a number of streets have been exempt from the directive. No allowance has been made for other householders and because they are the minority it is difficult for their voices to be heard. I urge you to offer them some protection. This could be in the form of a paragraph or clause inserted which would allow planning permission for change of use to an HMO where they are surrounded by other HMOs. This flexibility applies to only a small number of households and as such has little impact on the rest of the residential community. Its only impact will be a positive one as it is likely to encourage them to stay rather than sell up now to avoid being trapped in the future.
Rosebery Road	EX4 6LT	Occupier living at property. I am concerned about the negative impact that the Article 4 in its current form will have on a small number of residents who live in areas of Exeter that are already heavily populated by HMOs who will be effectively trapped by the restrictions as they would not be able to sell their houses. There has been some recognition of this issue as a number of streets have been exempt from the directive. No allowance has been made for other householders and because they are the minority it is difficult for their voices to be heard. I urge you to offer them some protection. This could be in the form of a paragraph or clause inserted which would allow planning permission for change of use to an HMO where they are surrounded by other HMOs. This flexibility applies to only a small number of households and as such has little impact on the rest of the residential community. Its only impact will be a positive one as it is likely to encourage them to stay rather than sell up now to avoid being trapped in the future.

Prospect Park	EX4 6NA	I express support for the proposal. Feel this action is being taken far too late. The preservation of housing stock that is suitable for owner or rental occupation by local working residents is vital and should not be jeopardised by giving priority to students. Opposed to exceptions. Larger houses would be ideal for conversion to apartments for sale or rent. The quality of life in Exeter is far more important than satisfying the ambitions of investors, developers and estate agents that blatantly support their ambitions.
Prospect Park	EX4 6NA	I express my support for the proposal. I consider even 20% to be excessive. It is a pity that past comments from residents in St James were not fully considered and now we are faced with an almost 100% concentration of HMOs. The numbers should never have arrived at this level. Where may I ask was the planning? Is Exeter a place to live permanently or merely a place in which to park your laptop whilst you study? I have watched the demise of ancient trees on University grounds. The University has vast areas of land suitable for building. If listed, then could the listing be lifted? Some beautiful Victorian and Edwardian houses have been converted into student accommodation. They have not been shown careful thought and consideration. What is going to happen to unsellable houses - will Exeter City Council, because of poor planning, offer compensation or buy up at realistic prices and turn them into first time buyer flats to give young people who work in the City the opportunity to live in the City. Oppose exemptions.
Prospect Park	EX4 6NA	Landlord - I express support for a clause to be inserted in the SPD which allows for greater flexibility and leniency in considering planning applications where owner occupier houses are surrounded by HMOs on two or more sides. This affects four owner occupier houses in Prospect Park. If inserted it would prevent them from being trapped if they wished to sell their house. They would have to drop the selling price considerably to attract buyers other than investors if the SPD were to be implemented in its current form. I am sympathetic to the plight of owner occupiers and like to feel I have a good relationship with them.
Prospect Park	EX4 6NA	I am very keen that the percentage of families and owner occupiers within the road remains high and so am pleased that you are taking measures to prevent the road from having further student housing. I have been informed that there is an issue with a few houses having student houses on both sides. Is it possible that these houses can have some flexibility in choosing whom they sell their houses to when the time comes that they want to sell? Perhaps they could be viewed on a case by case basis? I do feel that these residents who have been unlucky enough to live next to others who decided to 'sell out' to investors, shouldn't be penalised for it.
Prospect Park	EX4 6NA	Landlord - I express support for a clause to be inserted in the SPD which allows for greater flexibility and leniency in considering planning applications where owner occupier houses are surrounded by HMOs on two or more sides. This affects four owner occupier houses in Prospect Park. If inserted it would prevent them from being trapped if they wished to sell their house. They would have to drop the selling price considerably to attract buyers other than investors if the SPD were to be implemented in its current form. I am sympathetic to the plight of owner occupiers and like to feel I have a good relationship with them.
Prospect Park	EX4 6NA	Strong supporters of the proposal. Long overdue in view of the disappearance of many long established communities in the St James area in recent years. One proviso to my support of the SPD is a request for flexibility and leniency in planning applications when it comes to a change of use from an owner-occupier house to an HMO where the owner is surrounded on both or more sides by HMOs.
Prospect Park	EX4 6NA	Although we are in favour of the SPD going ahead we believe further attention may be required in its detail. There is a proposal suggested to include a clause whereby owner-occupied houses surrounded by HMOs on two or more sides would be omitted from the directive. In principle we agree with this. We would feel more comfortable if an insert included a condition whereby a seller would first have to market to private buyers for a specified period and required to accept an offer if it matched or exceeded the valuation provided by a surveyor approved or allocated by the Council.
Prospect Park	EX4 6NA	Occupier - I express support for a clause to be inserted in the SPD which allows for greater flexibility and leniency in considering planning applications where owner occupier houses are surrounded by HMOs on two or more sides. If inserted it would prevent them from being trapped if they wished to sell their house. They would have to drop the selling price considerably to attract buyers other than investors if the SPD were to be implemented in its current form. I am sympathetic to the plight of owner occupiers affected by the proposals.
Prospect Park	EX4 6NA	Occupier - I express support for a clause to be inserted in the SPD which allows for greater flexibility and leniency in considering planning applications where owner occupier houses are surrounded by HMOs on two or more sides. This affects four owner occupier houses in Prospect Park. If inserted it would prevent them from being trapped if they wished to sell their house. They would have to drop the selling price considerably to attract buyers other than investors if the SPD were to be implemented in its current form. I am sympathetic to the plight of owner occupiers who are affected by the proposals.
Prospect Park	EX4 6NA	Occupier - I am concerned about the negative impact the directive in its current form will have on a small number of residents who live in areas already populated by HMOs who will be trapped by the restrictions who will not be able to sell their house but will still be subject to the disadvantages of living in such areas. Properties surrounding them are unlikely to ever return to being owner occupied. Families and couples would not choose to buy a house in such areas. I am in support of the minority of householders in Prospect Park and Thornton Hill who are surrounded by HMOs and urge you to offer them some protection.
Prospect Park	EX4 6NA	I go to Stoke Hill School. Please put in a clause so I don't have to leave my house. I like my kitchen and my bedroom. I like my school because of my best friend.

Prospect Park	EX4 6NA	We love it here but feel we are being forced out dragging our children from their home and school if necessary to avoid being trapped here indefinitely. This is because our house at the lower end of Prospect Park is totally surrounded by HMOs. In addition the bottom end is in close proximity to the studenty streets, Culverland Road and Victoria Street (both exempt). A partner in a solicitors firm and 5 estate agents advise that our house would only be marketable to an investor. To avoid being trapped our only option would be to escape in a rush as there is such a short period of time between learning the outcome of the consultation and having to move before the deadline. Our situation is so clearly different from people who are not surrounded by HMOs. Our situation is more like that of the residents of the exempt roads. By exempting them you have recognised their needs and set a precedent. We have a lot of supporters who do not want us, one of four families with primary school age children, to move out. We should not have to prove unsaleability and our argument should be responded to by ensuring that a clause is inserted to allow owner occupiers that are surrounded by HMOs on two or more sides, be gra
Prospect Park	EX4 6NA	Owner occupier (extensive comments and research). I would like to argue the case for the insertion of a clause or paragraph which clearly states that any householder who has existing HMOs on two or more sides would definitely be permitted planning permission to change their house from a dwelling to HMO. This would give these householders similar rights and security as afforded those in exempt roads. You have recognised the issues by exempting roads where the concentration of HMOs is higher, therefore setting a precedent, but have ignored the minority of residents where there are pockets of high concentrations - why? Why does our welfare and security not count? You just want to bury us but surely we have rights as members of the community - otherwise what is the point of democracy. We have spent a lot of money on refurbishment and would not have done so if we had known about A4D. I am happy to live with students its the thought of being trapped that I hate.
Prospect Park	EX4 6NA	Occupier - I express support for a clause to be inserted in the SPD which allows for greater flexibility and leniency in considering planning applications where owner occupier houses are surrounded by HMOs on two or more sides. This affects four owner occupier houses in Prospect Park. If inserted it would prevent them from being trapped if they wished to sell their house. They would have to drop the selling price considerably to attract buyers other than investors if the SPD were to be implemented in its current form. I am sympathetic to the plight of owner occupiers who are affected by the proposals.
Prospect Park	EX4 6NA	Landlord - I am writing in sympathy with our neighbours in Prospect Park who live at the studenty end of the road who do not have any neighbours who are owner occupiers. I think these peoples' living experience is different to that of residents further up the road. Nice as they are, their properties would not appeal to many people because of their location. Some people might leave to avoid being trapped. I urge you to consider them by inserting a clause in the document that clearly states that if a family house has existing HMOs on two or more sides it should be allowed planning permission to change to an HMO. There should not be any need to prove that they could not sell the house to a family, couple or individual.
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Prospect Park	EX4 6NA	Owner student let - I write in sympathy with the householders who are penalised by Article 4 because they live in pockets where there are already heavy concentrations of HMOs. I refer to the lower end of Prospect Park. I urge you to introduce a clause which would allow them planning permission to change their own house to an HMO if they have neighbouring HMOs on two or more sides. These people have rights to financial security in their home and freedom of movement and a sense of wellbeing like anyone else.
Prospect Park	EX4 6NA	Landlord - I express support for a clause to be inserted in the SPD which allows for greater flexibility and leniency in considering planning applications where owner occupier houses are surrounded by HMOs on two or more sides. This affects four owner occupier houses in Prospect Park. If inserted it would prevent them from being trapped if they wished to sell their house. They would have to drop the selling price considerably to attract buyers other than investors if the SPD were to be implemented in its current form. I am sympathetic to the plight of owner occupiers and like to feel I have a good relationship with them.
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Prospect Park	EX4 6NA	Student living in Prospect Park. I am writing in sympathy with householders who are penalised by Article 4. I refer to the lower end of Prospect Park and other similar situations. I strongly urge you to introduce a clause to allow permission to change to an HMO if they have neighbouring HMOs on two or more sides. I do not think that proof of saleability should be included as it is onerous to prove and is unnecessary.
Prospect Park	EX4 6NA	Student living in Prospect Park. I am writing in sympathy with householders who are penalised by Article 4. I refer to the lower end of Prospect Park and other similar situations. I strongly urge you to introduce a clause to allow permission to change to an HMO if they have neighbouring HMOs on two or more sides. I do not think that proof of saleability should be included as it is onerous to prove and is unnecessary.
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Prospect Park	EX4 6NA	Potential problems will be faced by a small but significant number of house owners in Prospect Park i.e. those whose properties are between student lets. Unsuccessful attempts to sell two properties meant they were forced to sell to landlords. Not sure that ECC full realises what might be at stake for us. Prospect Park provides us all with an incredibly pleasant, safe and stimulating environment. We love living here. We feel certain that ECC will find some way of ensuring that we will enjoy the necessary flexibility for us to sell our properties should we need to, according to who proposes to buy them. It would be a sad and very damaging outcome should any family feel they must move now in order to be able to move at all.
Prospect Park	EX4 6NA	We fully understand the concerns that the Article 4 is intended to address but we feel that as it stands it will have major implications on the chances of us and the few other owner occupiers in the part of the street being able to sell at a fair price. Immediate neighbours were both owner occupiers. One is now a student house. The other was desperate to sell but had the welfare of the street at heart and held out for much longer than intended before eventually pushed to sell to a developer. What will our chances be in four years time? The concentration of HMOs in Prospect Park is very much at one end with huge implications for those wishing to sell. We think we are trapped by Article 4 if it does not allow for any flexibility. We are asking for the Council to consider some flexibility for houses such as ours to be able to sell to an investor if no other buyers come forward. There are very few houses in Prospect Park which would need this clause so the impact of a flexible clause on the more residential side would be minimal. The difference to us would be enormous and, in our opinion, only fair.
Prospect Park	EX4 6NA	Landlord - I am writing in sympathy with our neighbours in Prospect Park who live at the studenty end of the road who do not have any neighbours who are owner occupiers. I think these peoples' living experience is different to that of residents further up the road. Nice as they are, their properties would not appeal to many people because of their location. Some people might leave to avoid being trapped. I urge you to consider them by inserting a clause in the document that clearly states that if a family house has existing HMOs on two or more sides it should be allowed planning permission to change to an HMO. There should not be any need to prove that they could not sell the house to a family, couple or individual.
Prospect Park	EX4 6NA	I write to support the lobbying to insert a clause in the SPD to allow flexibility and leniency in planning applications when implementing the Art 4 directive. I feel that the houses at the bottom of Prospect Park which are privately owned but surrounded by students will, if put on the market, not be bought for family use.
Prospect Park	EX4 6NA	Support the SPD and believe it should be implemented as soon as possible. This planning directive is essential if the community of St James is to be maintained. We have reservations concerning the exemptions of 9 streets. The net effect is that they will become 100% HMOs. This will represent a loss of a valuable family housing resource and a continued loss of council tax income for the authority. We would like to see ECC being more positive about the 9 streets and introduce measures to encourage their return to being a balanced community. Representation makes three suggestions to return to a balanced community.
Prospect Park	EX4 6NA	I live in Prospect Park which I understand has 29% of homes claiming CT exemption. In practice the student houses are not uniformly spaced and the western end has a higher proportion of student houses. It would seem reasonable that owners of 'family houses' which are surrounded on all sides by student houses should have the option to sell their houses as potential student houses or family houses. I live towards the eastern end where there are more family houses and I have put my house on the market and, although not surrounded by student houses, it is apparent that potential buyers are put off to some extent by the perceived 'student problem'. Perhaps the SPD could allow, on a case by case basis, planning applications for houses in multiple occupation where houses are hemmed in by student houses.
Prospect Park	EX4 6NA	Landlord - I express support for a clause to be inserted in the SPD which allows for greater flexibility and leniency in considering planning applications where owner occupier houses are surrounded by HMOs on two or more sides. This affects four owner occupier houses in Prospect Park. If inserted it would prevent them from being trapped if they wished to sell their house. They would have to drop the selling price considerably to attract buyers other than investors if the SPD were to be implemented in its current form. I am sympathetic to the plight of owner occupiers and like to feel I have a good relationship with them.
Well Street	EX4 6QQ	Occupier - I express support for a clause to be inserted in the SPD which allows for greater flexibility and leniency in considering planning applications where owner occupier houses are surrounded by HMOs on two or more sides. This affects owner occupier houses in the St James area. If inserted it would prevent them from being trapped if they wished to sell their house. They would have to drop the selling price considerably to attract buyers other than investors if the SPD were to be implemented in its current form. I am sympathetic to the plight of owner occupiers who are affected by the proposals.
Well Street	EX4 6QQ	Occupier - I express support for a clause to be inserted in the SPD which allows for greater flexibility and leniency in considering planning applications where owner occupier houses are surrounded by HMOs on two or more sides. This affects four owner occupier houses in Prospect Park. If inserted it would prevent them from being trapped if they wished to sell their house. They would have to drop the selling price considerably to attract buyers other than investors if the SPD were to be implemented in its current form. I am sympathetic to the plight of owner occupiers who are affected by the proposals.
Well Street	EX4 6QQ	There are now so many student let houses in Well Street that it is impossible for local residents to sell their house to anyone other than a developer - no family would want to buy a house in Well Street now. We believe that Well Street has unique issues and should be considered separately from adjoining streets such as St Sidwells Avenue and St James Terrace. Well Street is a 'through route' for students making their way into Exeter for late night entertainment and back again in the early hours. No one wants to leave residents in a position where they can't sell their houses at all. Well Street should therefore be exempt from the Directive restriction. Local residents would then be able to sell their houses if and when they want to.
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Well Street	EX4 6QF	I fully endorse the sentiments and suggested proposal of your letter. I would hate to see my house converted to an HMO but if circumstances change I doubt if I could easily find a family to purchase my house. I am a long term resident is St James, living in Union Rd, Springfield Rd and Victoria St and Well Street. The Council has been slow to act. Why not have more students near the University. Bring in a tax on student housing/absent landlords who charge our children a fortune. I feel that those who have stayed the longest and learnt to live with the cycle of students will be the losers.
Oxford Road	EX4 6QX	We give our support to the SPD. However, it is with some disappointment that it appears that the document does not address the question of large-scale, purpose-built development for students. If the Council is serious about not wanting the balance and character of St James further disturbed, then how can these new developments, such as Stoneman & Bowker, which can only increase the density of students over a small area already noted for heavy concentrations of students, be excluded from this planning document? Oxford Road has seen a significant increase in HMOs over the last 18 months. The Council must put in an 'unsaleable' clause so if prospective individual and family buyers are put off by the student population proving that the property will not sell at the value of similar properties in less densely student populated areas, planning permission can be given for conversion.
Oxford Road	EX4 6QX	We give our support to the SPD. However as a resident in a road which has seen a significant increase in HMOs over the last 18 months, we can only accept it if an 'unsaleable clause' is included. There are 36 houses that face the road plus two large St James Rd student houses flanking the junction. At least 21 of these are student houses with three or more recently sold and the word is that landlords have bought them. We suffer from student behaviour and it is adding insult to injury now that we are faced with the prospect that the value of our property may be significantly reduced. The council should have put an effective restrictive ruling in place years ago when the University warned that the student population was going to rise and when we were made a Conservation Area. I will hold the Council responsible if I cannot later sell at a price commensurate to the real value. If ECC is serious about 'maintaining a healthy balance within the community' it has to stand by this by linking the SPD to planning applications and refusing any further development of large scale, purpose-built accommodation in our ward. There is no logic in the policy otherwise.
Mount Pleasant Rd	EX4 7AB	Disappointed that you are still pursuing your changes to HMO legislation. I really can't see what you will gain from it. You have put me in a position where I have had to sell my house to a landlord. No families showed an interest in the property and why would they given that in recent years you have granted permission for a tattoo parlour, off licence and beer garden within 100m of the property. Do you have any evidence that families actually want to live in this area? What is it about students you dont like? Do you have any figures showing the number of people actually suffering from students? Its serious when people feel they have no option but to sell up because of your actions, do you understand this?
Mount Pleasant Rd	EX4 7AH	Owner Occupier and Landlord - Seems to be discriminating against students who are bringing income to the City. There is no way of knowing where there is a house full of students or other people who share and that should not be the business of the council. Why should the council be focusing on this policy rather than providing core services such as refuse collection? I object to the map being defined as it is (giving 3 reasons). The council will have no way of knowing which areas have concentrations of students in C4 accommodation. I would like to see the removal of Tresillian Gardens, St James Court, and 64-75 Mount Pleasant Rd from the proposals as well as the area in Barnfield, Archibald and Athelstan Roads because I don't want restrictions imposed on my properties. The council should focus on working with the University to provide more suitable accommodation on or near the campus or on other brownfield land. The wording in the proposed policy is vague and does not state if this is for the whole area, by street or what. This is a point for objection in its own right.
10 Monks Road	EX4 7AY	Occupier - Concerned about negative impact the directive will have on a small number of residents who live in heavily populated by HMOs who will effectively be trapped by restrictions. Urge you to offer them some protection which could take the form of a paragraph or clause which would allow planning permission for change of use where the house is surrounded by two or more sides by other HMOs. Impact will be a positive one as it is likely to encourage them to stay rather than sell up now to avoid being trapped in future.
Monks Road	EX4 7AY	Occupier - As 10 Monks Road
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Monks Road	EX4 7AY	Occupier - As 10 Monks Road
Monks Road	EX4 7AZ	Occupier - As 10 Monks Road
Monks Road	EX4 7AZ	Occupier - As 10 Monks Road
Monks Road	EX4 7BB	Have consulted estate agents regarding the impact of Art 4 for both value and saleability. Advice is that there has been a £15k approx fall in value. This raises enormous concerns but it also makes the impact of the policy counter productive and thus a failure. We are surrounded by HMOs mainly students. The impact on us will be unfair, disproportionate and potentially devastating. It has an impact on our ability to seek employment and promotion elsewhere as we cannot sell. We are in contact with other owner occupiers to explore legal action. We would like exemption from Art 4 as has been done in other roads.

Park Road		Owner occupier of student let - concerned about negative impact on a small number of residents who will effectively be trapped. Urge you to offer minority of householders in Prospect Park and Thornton Hill some protection which could take the form of a clause to allow change of use permission where a house is surrounded on two or more sides.
	Unknown	In view of the high density of HMOs in St James and the additional students expected, I support the draft guidance document proposing containment of HMOs in St James.
Victoria Street		Landlord (Victoria Street) - We would point out that the University has to have sufficient accommodation within easy reach for its student population. It is clear it cannot provide enough on-site facilities and therefore the 'market' has to provide the balance. By seeking to restrict the supply of this commodity nearby, the Council may find that an unintended consequence may be to make the University less viable in terms of easy access by students. Your draft makes no mention of any studies to ensure the viability of the University in the future given this policy's introduction. In the concluding paragraphs the draft suggests that representations will be considered but implies in the text that the policy will be adopted. This is challengeable phraseology and should not be used.
Pennsylvania Cresc	EX4 4SF	We are in broad agreement with the proposals but express concern about the detailed implications this may have for us. Our house was originally in two independent flats. We converted it to one property for our family. In the future it may be necessary to accommodate a carer cum housekeeper with their own self contained accommodation. Pennsylvania Cresc has always had multi-occupancy at No 1 first as part of a University Hall of Residence until it was sold into private ownership. Garages at No 6 were converted into a residence and now occupied by students. The proposed regulations would appear to preclude redivision of our house should the necessity arise. If this is correct, we would reluctantly oppose the proposal.
Toronto Road		I would like to voice my concern over a few issues. According to your figures we have 9.4% HMO - this is clearly incorrect. Why wait until 20% is reached. This will lead to overlapping issues and therefore should be applied immediately otherwise streets like ours will be targetted by landlords. We have requested parking restrictions in our street - surely it should be the case across all streets with student pressure. Why only student HMOs? Where landlord property exists it will only grow and in turn they will rent out property to non student HMO groups again diluting permanent resident, family, populations. 20% is a figure that does not represent numbers of people in properties. Having been to Nottingham and Birmingham I do not feel you go far enough. You only need to look at the devastation of Victoria Street - local people will no longer be able to live near town without staying in student ghettos.
Higher Kings Ave		We are writing in sympathy with the householders who are penalised by Article 4 because they live in pockets where there are already heavy concentrations of housing in multiple occupancy. We refer to the lower end of Prospect Park and other similar situations. We strongly urge you to introduce a clause which would allow them planning permission to change their own home to an HMO if they have HMOs on two or more sides. We do not think proof of unsaleability should be included as it would be onerous to prove and is unnecessary. These people have rights to financial security in their home and freedom of movement and a sense of wellbeing like anyone else.
Toronto Road	EX4 6LE	I am writing to support the proposal to restrict planning applications for HMOs where the proportion of homes claim CT exemption due to entire occupation by students exceeds 20%. I would like to request further consideration to the following points: the percentage should be reduced to 10%. Using the occupancy averages outlined in the discussion papers, a 20% cap in Toronto Rd would result in 41% of the population living in HMO accommodation. Communities should be measured by population segmentation not houses; the size of the area within the scheme should be broken down into smaller sizes - it is feasible for smaller roads to become 100% HMO; the measure doesn't address chronic parking pressure; a robust early warning system needs to be in place to trace CT exemptions; it doesn't account for other types of multiple occupancy.
Hoopern Street		I do not think that such stringent rules are warranted. I have never had any problems with students - only non students. Hoopern Street is one of the quietest places I have lived in. The only problem is the rubbish. Parking is not a problem since the introduction of residents parking permits. On the whole the students are very polite and measures such as the community day and the community officers that the University has introduced have ensured that the acceptable behaviour of students continues.
Oxford Road	EX4 6QX	We wish to give our support to the draft SPD. However, we believe that the document should also address large scale, purpose-built developments for students. The problem is that St James faces it two-fold: the loss of family homes to HMOs and the overwhelming number of students who together create an unbearable amount of noise, rubbish and nuisance. If the character of St James is to be protected, we have to both prevent the sale of more properties for conversion to HMOs and keep the numbers of students to reasonable levels. We are particularly keen to see that the community in our own street is not allowed to be encroached upon any further. I believe that the community retains enough of its original character for the houses to be saleable to families and permanent residents so long as the area is protected. We do not think there is any time to lose. The SPD should be implemented immediately.
Prospect Park	EX4 6NA	We fully understand the rationale for limiting approval of applications for HMOs. We understand that students and other house-share groups are important to Exeter's livelihood, its energy and diversity and that the City should not be excluding such groups but, at the same time, HMOs are sometimes associated with noise, parking problems and issues of maintenance/presentation. There should be a balance. In overall support of the guidance but would like it to recognise those of us in family occupied homes may struggle to sell to any buyer other than a prospective landlord. If we find ourselves unable to sell, or that the only sale is at a reduced price, we would like to know that there is some flexibility in the system. This will be complex to implement but would suggest some kind of clause enabling a change if after 12 months a sale could not be achieved.

Prospect Park	EX4 6NA	Support the draft SPD. Have the following observations. Due to the degradation of the neighbourhood and its effect on property prices and quality of living, it is vital to curtail further proliferation of HMOs. Don't agree with the concept of allowing further HMO development in streets that have already exceeded 50% of HMO development - even if they are regarded as 'lost causes' there is a knock-on effect to surrounding streets. Suffer constant aggravation from parking overload (students using Visitor Passes and landlords with notes on screens), refuse, noise, constant building activity etc. SPD proposal should not be restricted to HMOs of 3-6 but large properties as well. Consider compensation scheme for C Tax reduction for family homes close to HMOs and scheme (funded by University) for families who find it difficult to sell. Introduce, as early as possible, a Business Rate for HMOs. Opinions of full time residents should be considered over and above those of the temporary or non ward residents.
Councillor		Certain parts of Polsloe are now becoming very high density student occupied and I would urge that they become part of the restricted area (e.g. Monks Road, Priory Road, Abbots Road, Thurlow Road, etc)
Northernhay Street	EX4 3ER	Would like to express support for the proposal. Social cohesion is supported by ensuring that areas do not become too heavily weighted towards student occupation, but rather a mix of residents is maintained.
Castle Mount	EX4 4JW	I should like to write in support of the draft SPD. This proposes to resist planning applications for houses in multiple occupation where the proportion of houses claiming exemption from Council Tax due to occupation by full time students exceeds 20%.
Hillside Avenue	EX4 4NW	I am writing to you to indicate my very strong support for the proposal to limit the amount of multiple occupancy accommodation permitted within the St James ward.
West Avenue	EX4 4SD	We would like to voice our strong support for the proposed Council policy to prevent further over-concentration of HMOs in our area.
Hooper Street		I have sold my house in Hooper Street where I was sole occupier. My decision to do so was not related to the number of student houses in the street. There was a noticeable change in the character of the street in the 14 years I lived there. Some former residents have died and younger families moved out. In some cases increasing numbers of student houses was one of the reasons they gave but the houses are small and without gardens so are not ideal for families. The introduction of the new policy was a minor factor in my choice of timing. The house sold very quickly to an investment buyer for more than I was asking.
Waverley Avenue		I am alarmed by the number of properties in our neighbourhood that are currently being sold to investors looking to house students. This is an unintended consequence of the proposal (which I support). People are selling as they think that when this is implemented, properties will be worth less. At the moment, 3 or 4 houses are being sold in Waverley Avenue to investors. This is misguided in my opinion but the result is that there will be more HMOs here and in the surrounding areas.
Old Tiverton Road		We think there should certainly be a limit to houses in multiple occupancy for the following reasons: Loss of council tax revenue, depreciation of private property values in high HMO areas, noise nuisance, rubbish nuisance, parking problems.
Romsey Drive	EX2 4PB	I am writing to object to the proposal for the following reasons. The owner of the property in the area has a right to use his or her property to maintain a livelihood. Would it be right for the Council to interfere in the matter of livelihood? The action would cause a shortage of cheap accommodation for the local students. Pushing all accommodation towards UNITE is not a good idea. Congregating students in the areas close to the University must surely be a good thing? Balance is a value judgement. So it is best to let market forces decide. The economy of Exeter depends a lot on the contributions from local and foreign students. Education is a global industry - we are competing with USA, Canada, Australia, Japan, Singapore, Malaysia etc. Exeter City and University are good brand names to foreign students at the moment. Do not make it difficult for them to choose Exeter as their number one destination. Providing student accommodation is a good public activity not purely a commercial activity.
Chute Street	EX1 2BX	We are writing to express support for the basis of the proposed approach.
Horseguards	EX4 4UU	We entirely support the proposed new guidance and hope the Council will adopt the proposal.
Castle Mount	EX4 4JW	I support the adoption of the proposed new guidance. I have lived here since the houses were built in 1997. I have certainly noticed a change in the environment around me with a large increase in the number of students and a decline in the number of older residents and families. We are currently enjoying the Easter break and if David Cameron asked me to respond to his 'happiness survey' today I would say that the peace and relief I feel when it is the University holidays makes me happy! We have experienced the most acute problems with students in our small close. It is my opinion that the area is now saturated. Private landlords and the University are making money at my expense and at the expense of other local residents who will remain whilst the students come and go. People have to move on when their streets become overwhelmed with students. I would hazard a guess that very few graduates stay in Exeter and contribute to the local economy. I hope that this new draft is accepted so that the situation does not get worse. With projects such as Bishop Blackall excluded anyway, the number of students will still be greater in the locality.

Rosebery Road	EX4 6LT	Occupier living at property. I am concerned about the negative impact that the Article 4 in its current form will have on a small number of residents who live in areas of Exeter that are already heavily populated by HMOs who will be effectively trapped by the restrictions as they would not be able to sell their houses. There has been some recognition of this issue as a number of streets have been exempt from the directive. No allowance has been made for other householders and because they are the minority it is difficult for their voices to be heard. I urge you to offer them some protection. This could be in the form of a paragraph or clause inserted which would allow planning permission for change of use to an HMO where they are surrounded by other HMOs. This flexibility applies to only a small number of households and as such has little impact on the rest of the residential community. Its only impact will be a positive one as it is likely to encourage them to stay rather than sell up now to avoid being trapped in the future.
Waverley Avenue	EX4 4NL	I fully support the principle of providing control of further houses in multiple occupation in St James ward and parts of the adjoining wards to the north and east of the city centre. My concern is that the proposal sets the limit too high to be effective. 20% is one in 5 houses. Thus in a street of 20 homes, the potential would be for 4 to be student HMOs. In essence, 8 properties would directly neighbour a student house. Students should be spread evenly through the city and not ghettoised. They are as capable as travelling to study as others are of commuting to work. Thus the cap should be set at a level in proportion to that of the overall number of student houses in Exeter. To put it another way, a cap of 20% suggests that this number is acceptable and sustainable. It is not - it should be lower. The objective should not just be to stem the tide but to put measures in place that might reverse it in time.
Marifield Avenue	EX4 6JN	I fully support the proposal. In this area Victoria Street, Springfield Road and Culverland Road are almost entirely occupied by students. In the last year or so Union Road has been going the same way with all the problems it entails.
Oxford Road	EX4 6QX	We wish to give our support to the SPD. However, we would like to request that exemptions be made for house owners in Oxford Road. It must be recognised that we may find selling our houses to anyone but a developer, or at an acceptable price, difficult. If this is the case we must be allowed to sell our houses to whom we can get the best price from. We are bewildered and disappointed that the SPD does not address the question of large-scale, purpose-built development because if you are serious about not wanting the balance and character of St James further disturbed then how can this not include discouraging any more development of accommodation with heavy concentrations of students?
Elm Grove Road	EX4 4LL	As a property owner and resident of St James ward I would strongly support resistance to planning applications for houses in multi occupancy in this part of the city. Areas of concern include: developers buying up large numbers of properties; the ward is fast becoming a University campus; lack of understanding of the problems caused and the harm to the neighbourhood by the local councillors; imbalance of student accommodation in comparison to normal residential property.
Powderham Crescent	EX4 6DA	We support the proposal to restrict the spread of HMOs. We feel it is vital, both for St James and the City in general, to maintain a balanced community. At present we have a reasonable balance in Powderham Crescent and generally good relations with students neighbours but any increase in HMOs would completely change the character and atmosphere of the area.
Bystock Close	EX4 4JJ	I am writing to support the proposed SPD. At our local neighbourhood meetings, I and others have repeatedly expressed concerns about the imbalance of housing in St Davids which can and does have a profound effect on social cohesion. I wholeheartedly support the Council's proposal.
Bystock Close	EX4 4JJ	I wish to support the proposed SPD. Our neighbourhood in St David's already has an imbalance of HMOs and yet more student accommodation is being built under the Iron Bridge. As local residents move away, it does become harder to keep our community together and it is also harder to attract the local services into our area e.g. we have no GP surgery just a needle exchange at the Clock Tower.
Thornton Hill	EX4 4NS	I am writing to express my support for the new Student HMO planning policy for St James.
Velwell Road	EX4 4LD	I am writing to support the proposals. HMOs have already destroyed communities in the city and whilst students etc need to live somewhere it should not be at the expense of settled communities. It seems as if the whole of St James ward is becoming an extension of the University campus. This leads to tension between student and normal families as they have such different lifestyles. Enough is enough we should not have to endure any more. I trust this will put an end to developers buying houses and changing their use without planning permission and then totally ignoring requests to apply for consent as has happened in Velwell Road. I am shocked that you allow such flagrant behaviour. I hope you can appreciate the feelings of frustration and anger felt by council tax payers.
Thornton Hill	EX4 4NS	I am writing to express support for the new HMO planning policy. I am pleased that the planning department is taking steps to prevent further damage to this area caused by the associated problems that are very evident due to large numbers of existing HMOs. I hope that this draft policy becomes a reality as I am sure it will encourage the rebalancing of the communities in the area.
Monks Road	EX4 7BL	I was very pleased to received a letter, with all the worry about Multiple Occupation in certain areas. There is no doubt it alters the community. The bottom end of Monks Road so far is not spoiled, but they are creeping in with 3 bed terrace houses originally built for families now with 6 or more students in them.

Thornton Hill	EX4 4NN	I write to say that I fully support the new Student HMO planning policy for St James.
West Avenue	EX4 4SD	I am writing to give support to your draft guidance document which proposes the containment of HMOs in our area. Yours is a sensible and reasonable approach given the existing high density of HMOs in St James and, of course, the additional students we can expect once the Bishop Blackall and Tennis Court developments have been completed. Thank you for taking this initiative.
Castle Mount	EX4 4JW	I am in favour of the proposal to reduce the proportion of HMOs in any area to 20%.
Thornton Hill	EX4 4NN	I am writing to support the proposed policy change on HMOs in Thornton Hill/West Avenue area of the city for the following reasons: There is evidence that when student HMOs become dominant the amenity is much reduced, particularly through rubbish issues and noise pollution; this is a Conservation Area of Edwardian arts & crafts housing; the area will already have a large student population once the conversion and building on the Bishop Blackall site is complete; given the University's extensive building programme of residences elsewhere in the city and the potential reduction in visas for overseas students, there is likely to be less demand for HMOs in future. People living in the area feel very strongly about this and will continue to oppose all new HMOs. We therefore hope you will support us and continue to resist planning applications.
Highcross Road	EX4 4NP	I am writing to express my support for ECC's revised planning policy. The reasons for objecting to an increased proportion of HMO dwellings have nothing to do with any 'anti-student' or NIMBY mentality: it is simply a question of ensuring that there is an appropriate balance of accommodation in the city, and one that does not exert undue pressure on public services and the reasonable expectations and good-will of residents.
West Avenue	EX4 4SD	We cannot stress strongly enough our support for the proposed threshold. Our area in lower Pennsylvania already suffers severe over population of HMOs. The area has suffered greatly as a consequence. Any measures that can be taken not only to halt the creation of more HMOs but also help return blighted areas to family homes would be supported by most residents in the area. The suggestion of an unsealable clause I feel is a strong retrograde step and other measures should be considered, eg the removal of council tax on the blighted property to make a sale more desirable.
Albion Place	EX4 4LH	We are very glad that ECC is looking at the situation regarding HMOs, especially student accommodation. We are aware of this worrying trend as our daughter who was born and bred here has recently been looking for family accommodation. We welcome students but there is a huge bias towards student lettings and how virtually impossible it is for a family to find, let alone have a choice in, suitable accommodation. What are local families to do when they cannot afford to buy? Students bring business to the city but they have no investment in Exeter as a home and it takes away any sense of community as the population becomes transient, maintenance and upkeep of property falls, there is a shortfall in council tax income which the local population has to bear. The system is exploitive of students - agencies charge up to £100 a month more. We sincerely hope for a positive outcome to avoid over concentration of HMOs in favour of the local community and its peace and well being.
Thornton Hill	EX4 4NN	We fully endorse the draft proposal to resist planning applications for HMOs where the proportion of HMOs claiming exemption exceeds 20%. It is clear that any further developments in this area will have a detrimental effect on the current housing balance. To maintain the mixed economy of this community it is essential that we should try to do as much as possible to encourage more families to relocate into the residential streets of St James.
Castle Mount	EX4 4JW	I am very concerned about HMOs in this area, the harm caused by excessive student numbers in relation to family can only be detrimental with the weakening of the community. I therefore support the SPD for the inclusion of Castle Mount withing an inclusion zone.
Union Road	EX4 4HU	I am writing once again concerning your proposal to ban HMOs in certain parts, to register a plea that in your deliberations you are mindful of the circumstances of some of the longest residences in some of these roads. We bought our house over 26 years ago when the University was much smaller. We have endured the noise and drunken behaviour which has been unpleasant and annoying. Our one consolation was that having a house of decent size it would be eminently sellable when we got to the point of wanting to downsize - after all these years this will disappear in a legislative decision We have had all the negative aspects and now the indignity of a house that can no longer attract two thirds of potential buyers. Who is going to compensate us? We have paid large amounts of council tax - they pay nothing - the situation is extremely unfair. We would urge you to think about where this might leave those residents who have lived longest in the area. Would it be possible to write in a 'discretionary clause' for householders who have been residents for over 25 years in the affected streets, to still have an HMO option when selling on.
Blackall Road	EX4 4HD	I would like to strongly emphasise my objections to your proposed restrictions especially in Blackhall Road as I fear they will have an irreversible negative impact on the student letting market in a city ward that is so dependent on the excellent University. In addition, I strongly oppose the classification of a 3 bed property as an HMO, and I implore you to raise the criterion to those of 5 bedrooms or more.

Castle Mount	EX4 4JW	I am concerned and worried about the future of St James ward as a resident in it. The feeling and experience of daily life here is changing strangely. The number of student/single young people taking over family homes results in a fractured neighbourhood where locals don't know each other, children are rarely seen, shopping habits have to change and a temporary tenant with no concern for the base community takes over. Local councillors are not showing their allegiance to local voters and some appear to consider the expansion of the University to be a vote winning factor. I do not feel I have had a vote on this and resent the changes being forced upon me by local developers taking over a residential area for short term profit. Please do what you can to object to more HMOs in St James.
Thornton Hill	EX4 4NN	I am writing in full support of a new planning policy for St James. This change in policy is long overdue. The student population has already damaged the balance of our community, leaving many houses vacant for nearly half of the year in many streets. Certainly the University student population is good for the city but not at the expense of families, professionals and long term residents who also serve the city and deserve to live in stable communities without having to put up with late night noise, anti-social behaviour and a breakdown in neighbourhood continuity. I encourage the integration of students across a wider spread of the city and in appropriate accommodation that will not affect the balance of residential strongholds.
Thornton Hill	EX4 4NN	I am writing in full support of a new planning policy for St James. The change in policy is long overdue. I see no reason why the student community should not be integrated over a wider spread of the city, both in private and purpose-built accommodation. The area of concern should be opened up to families and professionals who also have a need to live near the city centre. Many students say that even they do not wish to live in student dominated areas. I agree that certain streets where the high level of student HMO occupancy is preventing the few remaining residents from selling to incoming families, should be treated as a separate case. I am in agreement that where an individual might experience difficulty in selling their house due to immediate HMO occupancy - BUT only after proving that all other avenues and a fair sales period has been proven.
Thornton Hill	EX4 4NS	I am writing in full support of the new planning policy for St James. Since moving to Thornton Hill in 2003 we have seen significant change to this area. Long established residents of Thornton Hill, Waverley Avenue and Hillside Avenue have moved away and we have seen a marked increase in the number of student occupied houses. If this is allowed to continue unabated, there is a danger that the makeup of the population in this area will become imbalanced which has already happened in roads such as Longbrook Street. I am sure I am not alone in feeling a sense of shame every time I walk into the city past rubbish strewn gardens and poorly maintained properties. Please think carefully about where students are housed in future. Exeter is small and there is no reason why students can't be housed right across the city in smaller concentrations thus maintaining the balance of our communities.
Thornton Hill	EX4 4NS	I give my full support of a new planning policy in St James. The current situation has been allowed to run out of control and it is now crucial that up to date planning policies are introduced in order to restore a balance in the community.
Pennsylvania Rd	EX4 6DW	I write in full support of the proposal to resist planning applications for HMOs. The local community is already imbalanced and any further such development could only be detrimental. I object particularly to the demolition of front gardens and their replacement by multiple dustbins, litter and waste.
New North Road	EX	We are wholeheartedly in favour of such restrictions. Exeter is not Oxford or Cambridge. The city has been here for more than twenty times as long as the University and when we bought this house in 1978 it was a relatively small concern not excessively or adversely affecting neighbouring residential areas. Since then it has grown exponentially destroying the fine natural environment of its own campus while bringing in more and more customers. This is creating an increasing tension of town versus gown. We have nothing against students per se and observe that the vast majority of anti social and disruptive behaviour is produced by British undergraduate students, a great many of whom are on an alcohol fuelled adolescent joyride financed by unearned money. The foreign students, graduate students and mature students are far less problematic. Why not have the University build accommodation within its own land as is done at Wyvern Barracks and CTCRM. Then they would not have to be billeted on the local population turning whole streets and neighbourhoods into zones dominated by persons whose natural hours and recreations are incompatible with the lives of true citizens of this city.
High Kings Ave	EX4 6JP	I write in support of this proposal. There are many houses being used for multi occupancy in this area and even more, it seems, recently being let for student use in particular. It is such a great pity as such a high concentration of student lodging concentrated in the EX4 postcode really does degrade the streets and local community. The amount of rubbish littering these pavements, falling out of bags, food waste, broken glass and litter not even in bins, is very disheartening. Difficulty with car parking too from all the extra lets becoming a problem. There is too high a proportion of HMO letting around Pennsylvania/St James and it would be reassuring if it could be limited in future and the local community a more balanced mix of owner/occupier and lets.
Pennsylvania Cl	EX4 6DJ	Welcome plans to restrict HMOs. We appreciate the benefits of having a University in Exeter but equally we have to put up with the downside of having so many students; drunken shouting late at night; rubbish and litter in streets, parking in undesignated areas and increased insurance premiums because of living close to areas where insurance claims are made. We live in the blue area where it is stated that 13.9% of households are HMOs. We are concerned that there will be rush by landlords to buy further properties in this area to get up to the 20%. The north side of Union Rd has been converted en masse to HMOs and the with the proximity of Culverland Rd/Springfield Rd/Victoria St all presumably well in excess of 20%, we are concerned that there will be strong inducements for landlords to start "mining" the neighbouring blue areas. In fact, almost all of the properties south of us (our immediate neighbours) are now HMO. Is there a case for extending the red 20% area further north of Union Rd to reflect the local high concentration of HMOs? Try to monitor/restrict conversion in blue areas and consider extending red 20% areas to reflect concentrations.

Well Street	EX4 6QL	I would like to support the proposed SPD and request that Well Street be included so that planning permission will be required for a material change of use. There are many reasons for my support most of which have been identified which is why the SPD was raised originally. I would also like to point out that it would be an anomaly not to include Well St whilst cul-de-sac streets off of Well St like Sidwells Avenue, Brooke Green Terrace and Clarence Place are included which, if Well St was not included, could see these streets being seen as cut off and isolated. Also with business growing in Exeter and families moving in, having family homes in Well St with St Sidwells School being perfectly placed, would allow families to live within walking distance of a school while working in the City thus cutting traffic.
Lucas Avenue	EX4 6LZ	We wish to register our support for this proposal - in fact we feel it is long overdue in respect of some streets which have become like student ghettos. We are very anxious that Lucas Avenue is not taken over in this way. "Studentized areas" tend to be noisy and untidy with unmanaged rubbish disposal and the street parking situation completely unacceptable in term time. As a council tax payer we object very strongly to subsidising so many properties in which neither the tenants nor their landlords contribute to community costs. Much more accommodation should be made available on the University campus not in local houses nor in blocks such as those proposed in Sidwell Street and Western Way.
Park Road	EX1 2HP	We would like to affirm our support for the principle of potential future control of further HMOs in our area as we consider that there is no longer a reasonable balance of different types of household. We purchased our house in 2003 and have largely good experiences of living amongst students. We also acknowledge the benefits students and the University bring to the city in terms of employment, cultural audiences, cultural events, consumer income, skilled workers etc. Our concern is the number of HMO properties which we feel neither benefits the students nor permanent residents as the quality of day to day life deteriorates. In recent years we have seen an increase in noise, rubbish and parking problems. Large numbers of houses being deserted in holiday periods. There is reduced community cohesion as students tend to live in the streets for 30 weeks. The longer term problem is that houses which are converted to HMO are not easily converted back to family homes. Demand for nursery and school places, parks etc drops and the area become less attractive to families. We are grateful for all the Council has done so far working with the University to try to address this problem and urge you to continue.
Mansfield Road	EX4 6NF	After careful consideration I would like to provide my opinion on the SPD proposal. The area I live in is over populated with students in shared houses. The litter has increased considerably with takeaway cartons in the street, there is vomit on the pavements on regular occasions. As an elderly citizen who lives alone and needs rest, extra noise pollution is very disturbing and unsettling. With these problems due to the over concentrations of housing in this area, I am for the proposal 100%.
Howell Road	EX4 4LN	We fully support the proposal to resist planning applications for HMOs for students where this exceeds 20%, the inclusion of C4 (small HMOs) in this policy; applying restrictions to the area shaded red on the published map. Agree that this would help fulfil the criterion (b) of policy h5 of the adopted Exeter Local Plan which states that the conversion to HMOs is permitted provided this does not create an ' <u>over concentration</u> ' of the use in any one area of the city which would <u>change the character</u> of the neighbourhood or <u>create an imbalance</u> in the local community". With the number of students occupying roughly 27% of the St James area, this clearly means the proportion of students living in the area is much higher because you have more living in each house and there are also students in purpose-built accommodation. It seems likely that student numbers will be well over half of the resident population! Danes Rd now has about 80% of properties let to students. It used to have an active residents' group and mixed population. Most families have moved out leaving good quality housing for students with a short term interest in the area and some landlords who have no concern and do not look after their properties.
	contd	If this policy is adopted then it will be very important to implement enforcement effectively. As some streets are now so student dominated you need to protect other streets in the area with lower numbers so some balance is achieved overall. If this policy is not implemented then it is likely that many more streets will become dominated by students. Once properties start changing there is a domino effect with more people wanting to move out. Using good housing for students means people have to look elsewhere for accommodation and may increase prices for purchasing and renting. It would be better if the University campus was used for most new students numbers - there is enough room. If new accommodation is needed we do not think it is vital for so many to be close to the University. We think it is reasonable that the accommodation be spread more fairly across the city.
Velwell Road	EX4 4LD	I wish to lend my very strong support to the above document. St James' ward already has more than its fair share of HMOs and if no restrictions are put in place there is a real danger of the area becoming an extension of the University campus, thus altering its character to the detriment of existing householders. This would in turn weaken the sense of community which very much exists in remaining areas at present, to lose it would be unforgiveable. I trust that the ward will be treated as a whole and not subdivided into arbitrary areas when considering the 20% limit.
Thornton Hill	EX4 4NS	I am pleased that the Council is taking this long overdue initiative to control the growth of student occupied, multiple occupation in Exeter. High levels of HMOs and small flat occupancy by students does have a significant, and largely detrimental, effect on the lives of other residents. However, I would urge the Council to set the target figure at less than the proposed 20% for two reasons: If 20% of houses are HMOs then this means the proportion of the population who live in multiple occupancy will be much higher. Given the average household size is about 2.5 in the UK, and assume the average HMO contains 5.5 individuals, this means that the proportion will actually be about 35%. There are also many houses in multi occupancy partly occupied by students as well as small flats etc. We do not have the information available to estimate the implication in terms of composition of the population. If added to the 35% figure suggested above, it could easily mean the proportion of students could amount to at least 40% of the population. This is hardly a balanced community.
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Thornton Hill	EX4 4NN	As residents of over 22 years, we strongly support the proposed inclusion of Thornton Hill and other neighbouring streets into the new SPD restraint zone. During our time we have seen the conversion of far too many houses to HMOs and we are now virtually surrounded by a student ghetto. Our concern is nothing to do with house prices - we are not thinking of selling, but all to do with the fact that this is a Conservation Area of Edwardian arts and crafts housing unique in the city. This amenity is gradually being undermined and destroyed by encroachment of students who pay far less attention to the condition of their environment inside and out. We are already going to have two major developments of flats for students at the bottom of Thornton Hill and it seems utterly unnecessary to allow more family houses to be spoiled. The University is, in my opinion, over-reaching itself in terms of creating student accommodation and some restraints have to be placed on this. The Council can do this by far greater planning control and we urge you to do so in the interests of the city's few remaining areas of domestic architectural quality.
Highcross Road	EX4 4NP	I wholeheartedly support the Council's plan to produce an SPD. I would like to add that with the increasing numbers of student houses in Exeter an increasing burden falls on the ordinary residents to foot the bill for services provided through payment of Council Tax. Would it not be possible to levy a tax on non resident landlords many of whom may large profits from the rents they receive to at least cover the cost of refuse collection?
Well Street	EX4 6QQ	I am extremely surprised to discover that Well Street was not exempted in the SPD. There is already a high percentage of student accommodation here so restricting planning now is far too late. If restraint zones had been introduced a long time ago I would have been able to sell my house to a family, the only likely purchaser now would be a landlord/developer. If I am unable to sell, I will be effectively trapped.
St Marks Avenue	EX1 2PX	I am concerned that the imposition of the order restricts the natural changes that might effect residential areas. The emphasis is placed on student lets but HMO also covers other multi occupancy. Although I deplore the landlords that have derived considerable income from as many single room occupants as possible, they do serve a need. There will be an increasing need for single room space as people find difficulty in getting accommodation in the city. The main consideration for Planning and Building Control on conversion is the quality and living space provided - that area I feel is somewhat lacking in direction and I cannot see that this order will satisfy this viewpoint. You fail to address the aggressive approach by the University or their connected property companies in seeking planning against the wishes of residents in certain areas. I think this order is unadvisable, it discriminates against small private sector letting who have great support from students who can take a house as a group and avoid paying the high rates charged by the University.
Well Street	EX4 6QR	We have been residents of Well Street for over 25 years and have witnessed the steady rise of HMOs. We have adjusted to living in a high density student area and assumed that after our children left home we would eventually sell and buy something smaller. If restraint zones had been introduced 20 years ago we would have been able to sell to a family now the only likely purchaser would be a landlord/developer for the following reasons: high density HMOs in the immediate vicinity (6 out of 9 in our terrace); high density of HMOs in Well Street (over 50% if side streets are not counted in); Well St is a thoroughfare at night to and from other nearby high density student areas. These points make the property unsaleable to families and if we are unable to sell to a developer we will be effectively trapped.
Highcross Road	EX4 4NP	I am writing to signal my support for the revised planning policy on student HMO housing to 'resist planning applications for houses in multiple occupation where the proportion of homes claiming exemption from Council Tax due to entire occupation by full time students exceeds 20%'. The reasons for objecting to an increased proportion of HMO dwellings have nothing to do with any 'anti student' or NIMBY mentality: it is simply a question of ensuring that there is an appropriate balance of accommodation in the city, and one that does not exert undue pressure on public services and the reasonable expectations and good-will of residents.
	Unknown	Landlord (abridged from extensive comments). I agree wholeheartedly with the present government's decision to abolish the April legislation issued by the then Labour government. It is inexplicable why Exeter City, along with a few other councils in England, have decided to waste the public's time and money on the restoration of an ill conceived policy. The new government has seen the shortcomings of the legislation passed in April 2010 and saw the effect it had on the property market, on students and on property values in University towns. Your very own statement 2.1 in the draft SPD (App 1) illustrates the very reason why your proposed legislation should not come into force. We have a first class University while on the other hand we have a Council which is intent on manipulating planning laws to limit accommodation which will make it harder for students to find private housing. The public consultation lacks consultation with students themselves. Local residents will want to prevent further studentification. Why does the general public and City Council Planning Dept have such antipathy towards students.
	contd	Legislation is clearly targeted at student HMOs given the way it is to be judged on council tax exemptions. I have many student properties in Exeter, Plymouth and Truro and with proper management and guidance, students do not behave any differently to other residents. The way forward is to strengthen and broaden the present licensing system. You will force students to occupy houses further afield which will impinge on residents in other areas, particularly those on the fringe of your designated zones. The expanded licensing scheme should be for all HMOs in the whole city. You have identified nine streets which will be exempt. However, there are many, many streets where there is already high student occupation where the legislation will impact on saleability, Portland Street is one such road. The proposals are unwanted and an ill-conceived attempt attempt to manipulate the property marketplace in parts of Exeter and are a serious impediment to students. If you base your decisions principally on the majority testimony of owner occupying residents, then your consultation will be incomplete and highly suspect.
Portland St		Landlord. In para 2.1 the comparison of student exemption figures is misleading - referring to PMWG 16/6/2009 there was a change in the way figures are compiled in 2007 and 2009 making the numbers in that paragraph inappropriate. The requirement to apply for consent will be a major deterrent to purchasers in those areas where student density is still below 20%. If it were possible to defer introduction in those areas currently not considered a problem (striped on plan) this would be much preferable to current owners and investors. University SPG states that further student accommodation is to be encouraged in St Davids etc. However, St Davids seems to be included in the Art 4 Directive - is this a contradiction to the 2007 SPG? Earlier documents refer to a threshold of 25%, now changed to 20%, I urge you to reconsider. If pressure from student numbers increase with more demand on stippled areas, a differential in property values between C3/C4 will result. Those that pushed for the Directive will begin a campaign for its abolition due to the adverse affect on property prices. If on the other hand, pressure from student numbers does not increase, then the Directive will be unnecessary as landlords will leave the market resulting in a decrease in the proportion of properties with student exemptions.

RESIDENTS' GROUPS

36 - Residents of Well Street	We wrote on 10/3/2011 with 32 letters from residents of Well St making a representation for our street to become exempt from the planning restraint. Now enclose 4 further letters. PMWG on 8/2/2011 (5.20) indicates that "Members may wish to allow further applications as exemptions to the policy if there is public support" in addition to the 9 streets already excluded. We argue strongly that Well Street should be exempt in a similar way. Reasons are: high density in the immediate vicinity (10 out of 13 in the block between Wells Tavern and the new development at the n/west end of Well St; high density of HMOs in Well St (over 50% if side streets are excluded); planning permission may be granted for purpose-built student accommodation "around Exeter City Football Ground" (para 7.3 of Executive minutes 28/9/2010); Well St is a thoroughfare at night to/from other high density student areas. This makes our properties unsaleable to families and, if we are unable to sell to an investor, we will be trapped. The alternative whole street approach would be to consider each application on an individual basis in relation to the % of HMOs in the immediate radius.
12 - Residents of Elm Grove Road	We wish to give our support to ECC's draft SPD which seeks to avoid over concentrations of houses in multiple occupation and to maintain a healthy balance within the community.
25 - Residents of Velwell Road	We wish to give our support to ECC's draft SPD which seeks to avoid over concentrations of houses in multiple occupation and to maintain a healthy balance within the community.
31 - Residents of Devonshire Place	We wish to give our support to ECC's draft SPD which seeks to avoid over concentrations of houses in multiple occupation and to maintain a healthy balance within the community.
51 - Residents - Thornton West Residents' Asstn	A large number of residents throughout Thornton Hill, West Ave, Waverley Ave, Hillside Ave and Highcross Rd expressed a wish to support the proposed planning guidelines for control of HMOs in St James ward. 51 have signed in support to say "We wish to give our support to ECC's draft SPD which seeks to avoid over concentrations of houses in multiple occupation and to maintain a healthy balance within the community".
7 - Residents at Horseguards	We wish to give our support to ECC's draft SPD which seeks to avoid over concentrations of houses in multiple occupation and to maintain a healthy balance within the community.
65 - Residents of Howell Road, Danes Rd, Hoopern Street, King Stephen Close, Castle Mount, Velwell Road	We wish to give our support to ECC's draft SPD which seeks to avoid over concentrations of houses in multiple occupation and to maintain a healthy balance within the community.
37 - Residents of West Avenue	Most residents in West Ave have expressed their desire to support the planning guidelines for the control of HMOs across the St James ward. Some have not found time to compose an individual letter; some have not had notification; others have found it preferable to sign a standard statement of support to say: We wish to give our support to ECC's draft SPD which seeks to avoid over concentrations of houses in multiple occupation and to maintain a healthy balance within the community.

OTHERS

Secretary, Powderham Crescent Residents' Association	Fully support the principle which will provide future control of HMOs in the ward and in particular in Powerham Cresc. The active Residents' Asstn works to help maintain the Victorian façade, the central car park and the integrity of an inclusive community. For this to continue it is essential that we have a reasonable balance of family homes and HMOs to provide the care and continuity needed to preserve the community. People living in HMOs tend to be temporary residents who do not have the time or motivation to invest in the future of the Crescent. As the number of HMOs here continues to grow we are increasingly concerned that this balance is being eroded and have discussed for some years how our Council should have powers to monitor and control housing usage in order to protect and preserve Exeter's neighbourhoods. I hope the SPD will be adopted.
Exeter Community Trust, St David's Hill	We support the SPD. The Trust has taken ownership of Exeter Community Centre to provide a community hub in an area which has suffered community fragmentation as a result of overdensity of single person/student accommodation. As Trustees, we are undertaking this 'Big Society' project, our motto says "restoring the Centre in the Heart of St David's community" in order to provide essential services and a place for activities for a diverse community. Apart from almost 100% of HMOs in areas like Haldon Rd, Lower North St, St David's Hill has already, within 250yds, a high concentration of temporary accommodation facilities for single transient people. Our Vision states "The area of St David's is a community of people living in mutual respect of each other, irrespective of diversity; the style of buildings and built environment blends the best of new with the best of the old and there is balance between the buildings and green space; Residents care about and for each other and the area they live in; Community facilities and services have been developed in consultation with local people to meet their needs".

St David's Neighbourhood Partnership	I write to signal my individual support and speak on behalf of the Partnership who have growing concerns about the imbalance in our locality. This is not 'himbyism': the rationale and context for the community priority is reflected in the priorities listed in the 2004 document and reflects the overall Vision which is positive about inclusivity. We believe our Vision Statement is close to the Council's own Vision for Exeter. After 8 years of negotiation we have secured freehold ownership of Exeter Community Centre plus £1.4m to refurbish it. As Trustees we are undertaking this "Big Society" project "restoring the Centre in the Heart of St David's Community". There would be little value in striving to achieve this if the community was made up of a majority of students/transients with little or no stake in the community. Apart from almost 100% HMOs in areas like Haldon Rd, within 250yds we have: asylum seeker flats; women's refuge; Shilhay Meaningful Occupptn Project; YMCA; Youth Offending Team; Drug and Alcohol Rehab flats.
Residential Landlords Association, Roebuck Lane, Manchester	Association is opposed to the Article 4 Direction. Our experience is that little or no detailed work has been undertaken by authorities to determine the need for accommodation of this kind. Implicit in the making of the Direction must be a view that there is an ongoing need/demand for this type of accommodation. Draw your attention to PPS3 and seek your response on a number of relevant issues (response has been sent). Up and down the country Directions are being adopted as a 'knee jerk' reaction as a response to strident demands from local interest groups and local residents. We believe these issues of low level anti-social behaviour can be addressed by other means. How will need/demand be provided for within other areas it is to be stopped/restricted in certain localities? PPS3 requires you to take into account market information when developing planning policies for housing provision. You must adopt an evidenced based approach. We are concerned that in formulating a policy for those areas where permission may be granted planning policies must not contain restrictive requirements which would be tantamount to some kind of blanket ban.
University of Exeter Students' Guild	Extensive comments: Conclusion - It is the belief of our members that introducing the Article 4 Direction will adversely affect students, families, young professionals and migrant workers. It is our belief that planning legislation simply cannot be used for social engineering and to tackle behavioural problems on certain streets; from an ideological perspective and from a practical delivery perspective. We do not believe these proposals will tackle the problems that are looking to be addressed and furthermore they have the very real potential of making the situation worse than it is now. The Students' Guild urges the Council not to implement these measures, and instead work with us and other stakeholders in tackling the problems at hand in a more constructive and effective way. The Guild recommend, as an alternative, a landlord accreditation scheme, good practice partnership working, closer liaison between councillors and student representatives; and improvements in public transport to facilitate greater dispersal.
Terence O'Rourke Limited on behalf of University of Exeter	The University has taken a close interest in the proposals given that it is driven to a large extent by the issue of student accommodation of housing stock and issues arising in the community. The University is committed to ensuring that its activities do not have unacceptable negative impacts on the community of which it is part. It continues to bring significant benefits to the city. Final para of 2.1 implies that all council tax exemptions result from University student occupation. Whilst true of the majority, some may relate to Exeter College for example. The University is pleased to note the guidance does not seek to limit provision of purpose-built accommodation in the areas shown in Plan 1. The basis of selecting 20% as the defined level of over-concentration is not clear and without justification appears in danger of being arbitrary. It is not clear why the blue striped areas have been chosen - they range from 9.4% CT exemptions up to 16.9%. Other reasons why CT exemption might be given may not relate to HMOs. Are the proportion of CT exemptions a gross figure of all exemptions or are they related specifically to student occupation exemptions?