

Leeds HMO Lobby

Response to CLG's Consultation on *Houses in Multiple Occupation* *and possible planning responses*



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Abbreviations

CLG: Dept for Communities & Local Government

GPDO: Town & Country Planning (General Permitted Development) Order 1995

HMO: House in Multiple Occupation

INWAC: Inner NW Area Committee

LA: Local Authority

LCC: Leeds City Council

LPA: Local Planning Authority

PPS: Planning Policy Statement

SHAP: Shared Housing Action Plan

UCO: Town & Country Planning (Use Classes) Order 1987

UDP: Unitary Development Plan

Leeds HMO Lobby

Leeds HMO Lobby was set up by six local community associations in and around Headingley in February 2000 (South Headingley Community Association, Far Headingley Village Society, Headingley against Landlordism, Headingley Network, Kirkstall Village Community Association and North Hyde Park Neighbourhood Association), as a result of their collective concern for the impact on their communities of increasing numbers of houses in multiple occupation (HMOs). Since then, the Lobby has been joined by every other community association in Inner NW Leeds (comprising the wards of Headingley, Hyde Park & Woodhouse, Kirkstall, and Weetwood), and it now numbers some two-dozen groups. The Lobby is recognised by Leeds City Council (LCC) as representative of the local community on housing issues, and as such, it is a member of the Council's Private Rented Sector Strategy Group and its Shared Housing Group. Over the decade, the Lobby has contributed actively to the development of good practice in Leeds, which is brought together in the Shared Housing Action Plan. The Lobby and its works are described on its website, at <www.hmobby.org.uk/leeds/index.htm>

Good practice in Leeds has failed to prevent concentrations of HMOs and the consequent problems. Leeds HMO Lobby therefore welcomes CLG's *Houses in Multiple Occupation and possible planning responses: Consultation*.

Consultation Questions

Q1. Do you experience problems/effects which you attribute to high concentrations of HMOs?

1.1 Certainly. Leeds HMO Lobby was established in response to the impact of concentrations of HMOs on the communities of Inner NW Leeds, in and around Headingley. There are currently 7,622 HMOs in Leeds, of which probably two-thirds are in & around Headingley. These concentrations developed during the 1990s. At the beginning of the decade, some 20% of the population of Headingley Ward were HMO-occupants; by the end of the decade, this had risen to 50%. Analysis of the Census 2001 data by the Council shows an area of some two square miles where students exceed 25% of the population (**Appendix F**). The same data shows that in South Headingley in particular, in an area of 72 streets, in every one of these streets, the student population (in HMOs) outnumbered the resident population (**Appendix A**). Many of these streets, like Chestnut Avenue or Manor Drive, are now virtually entirely student HMOs. The upshot is huge imbalance in the local population, which is now overwhelmingly young, transient and seasonal (**Appendix B**, 3.1).

1.2 The demographic imbalance in & around Headingley has been widely recognised (**Appendix E**). In a recent Appeal Decision (on an application to build more student accommodation in Headingley), the Inspector noted that “the over-concentration of students in this part of the city would not sit well with the Government’s objectives of creating socially cohesive and well-balanced communities as stated in PPS1 and PPS3” (Appeal Decision APP/N4720/A/08/2074675, 19 Nov 2008, para 23).

- The imbalance has been recognised by Leeds City Council. A White Paper on *Shared Housing in Leeds* was adopted in 2001. As a result, the Student Housing Project Group (now the Shared Housing Group) was set up, which developed a *Shared Housing Action Plan* (**Appendix D**) and *A Strategy for Housing Students in Leeds*. The Council’s Inner NW Area Committee has set up a Students & Community Group.
- The imbalance was recognised in the Report by Darren Smith commissioned by the University of Leeds in 2002, when the term ‘studentification’ was coined. The University has since gone on to adopt both a *Housing Strategy* and a *Community Strategy*.
- Residents not only formed Leeds HMO Lobby, but in 2005 established Headingley Development Trust to intervene for a ‘sustainable local community in Headingley.’
- Headingley’s problems have been widely reported, not only in the local media (Crossley, Huston, Sanders, Tingle, Woodward), but also in the national media (Atkinson, Chrisafis, Clark, Flanagan, Hodges, Johnson, McCarthy, Midgley, Purves, Soni, Stott, Wainwright), both press and broadcast.

1.3 The demographic imbalance of Headingley, consequent upon the concentration of HMOs, impacts on local amenity. In short, Headingley suffers crime, squalor and a resort economy. Low-level antisocial behaviour is endemic; the local burglary hotspot is greater than all the other five hotspots in Leeds put together. The area suffers intractable waste disposal problems, which has led to the city’s worst rodent infestation. And far from boosting the local economy, this has been distorted towards

a very particular and seasonal market. (Further details are outlined in **Appendix B**, 3.2.1)

1.4 The most serious impact of the demographic imbalance arising from the concentration of HMOs, however, has been on the cohesion and sustainability of the local community. Turnout in local elections is now the worst in the city (see **Annex C**, 3.2.2). Declining amenity and rising property prices (due to landlord demand for HMOs) has encouraged emigration of residents from Headingley and prohibited immigration. Four local primary schools have closed (further discouraging revival). Fewer residents are left, who remain committed to their neighbourhood. Those who remain feel acutely the stress of imbalance, they are alienated by the loss of amenity, and are angered at the loss of their ability to direct the future of their community.

1.5 The local sense of *anomie* has recently been independently confirmed by research by Sheffield Hallam University: in December 2008, they published *Changing UK: the way we live now*. This report identified the Headingley area as having the highest index of anomie in the whole of England (ahead even of London), despite being a suburban area (see **Appendix C**).

Q2. Do you consider the current planning framework to be a barrier to effective management of HMOs by local planning authorities?

2.1 Yes - manifestly, the local planning authority (LPA), LCC, has been unable to manage HMOs in & around Headingley. This is not through want of trying. In the Revised Unitary Development Plan (2006), LCC adopted Policy H15, which established an 'Area of Housing Mix', which enables the Council to resist development applications which contribute to imbalance (for instance, refusal of the Glassworks proposal for additional student housing, which was supported at appeal, as noted above, **1.2**). However, Policy H15 is ineffective against developments which do not require permission - and local custom and practice has established that this is not the case for HMOs.

2.2 The key precedent was set by the change of use of 17 Ash Grove in South Headingley, from a family home to a shared house occupied by eight students. The Council considered that in terms of the Use Classes Order (UCO), a change of use had taken place, without planning permission, and therefore it issued an enforcement notice. But the developer appealed - and on 10 April 2002, the appeal was allowed (Appeal Decision APP/N4720/C/01/1071001). The Inspector considered that since the occupants *shared* facilities, "the students do live together as a single household." The Inspector (like many of his colleagues) interpreted the idea of 'single household' in *functional* terms: the occupants simply shared facilities; but on this basis, an army barracks could be conceived as a single household. On the contrary, common usage and housing legislation interpret the idea of 'single household' in *structural* terms, that is, on the basis of the relationships within the household. On this basis, there is a clear distinction between a shared house and a single household (typically a family). It is the lack of a clear distinction between 'single' and 'multiple' household which emasculates the UCO as a tool for the management of HMOs. Under the Housing Act 2004, the property would (and now does) qualify for a mandatory HMO licence.

2.3 The current UCO is intended to require planning permission for a HMO: “as a general rule planning permission will be needed before a dwelling house could undergo a material change of use to an HMO” (*Consultation* para25). What is clear is that this is not in fact ‘a general rule’. And the reason is the conflicting definitions of ‘single household’.

Q3. Could promotion of best practice measures as opposed to changes in the planning framework sufficiently deal with the problems associated with HMOs, in particular those problems often associated with high concentrations of HMOs with student occupants?

3.1 No. In fact, Leeds HMO Lobby disputes the assertion that there is “good practice in areas that manage to cope relatively well with high concentrations of houses in multiple occupation” (*Consultation*, para10). Leeds has been in the vanguard of developing ‘good practice’, yet Headingley remains the least cohesive community in the country. The Council has set up a Shared Housing Group, comprising representatives of all the major stakeholders (council, community, universities, students, landlords), to oversee strategy, and has adopted a Shared Housing Action Plan (**Annex D**). Under this Plan, the Council has introduced Policy H15 on Housing Mix into its UDP, and has produced a Student Housing Strategy; and a dedicated Housing Strategy for the Area of Housing Mix is in preparation. The Council has licensed far more HMOs than any other local authority, and is to consider additional HMO licensing in due course. The city has two accreditation schemes for landlords, run by the Council and by Unipol Student Homes. The University of Leeds has adopted Housing and Community Strategies, and appointed community liaison staff. The Council’s local Area Committee has set up a Students & Community sub-committee to oversee day-to-day tactics, including the Freshers influx, on-going term-time issues, and the Changeover exodus; and it has appointed a dedicated Community Planning Officer. The students’ unions undertake various efforts to address local problems. And the residents themselves have set up Headingley Development Trust, to regenerate the community. In nearly all of these measures, Leeds HMO Lobby has played a leading role.

3.2 Undoubtedly, the situation would be a lot worse without this ‘good practice’. Nevertheless, the Sheffield Hallam University report remains damning with regard to Headingley. The reason is that the measures taken address only the symptoms of the problem. They are quite inadequate to address the root causes - which is the concentration of HMOs in the area. It is the Lobby’s experience that good practice is of course necessary - but it is nowhere near sufficient. Concentrations of HMOs must be resisted, and for this planning controls are required. This is in fact recognised by the *Consultation*, which acknowledges that “this approach would not be able to prevent the clustering of HMOs” (paraA31).

Q4. If planning legislation is seen as a barrier to the effective management of HMOs in an area how should planning legislation be amended – along the lines of option 2 (introduce a definition along the lines of the Housing Act 2004) or option 3?

4.1 Concentrations of HMOs have caused problems, precisely because of the inadequacy of current planning legislation, the UCO. Option 2 addresses this deficiency directly (in its second variant). First of all, this Option removes the ambiguity over the meaning of 'single household'. It replaces the *functional* usage of Planning Inspectors (which allows any *shared* house to be a 'single household'). It substitutes the *structural* definition of the Housing Act 2004, which prioritises the relationships within the household (and therefore excludes *shared* houses).

4.2 Secondly, Option 2 explicitly removes all houses in 'multiple occupation' from Class C3. Either as a new development or as a change of use, they thereby become subject to planning control. The combination of these two steps provides LPAs with powers to manage the provision of HMOs, to be used positively, negatively, or not at all, as they choose. It also provides residents with a process which can alert them to proposals for HMOs locally.

4.3 Option 3 however takes an opposite approach. Though it proposes redefinition of HMO as in Option 2, instead it goes on to remove HMOs from the UCO altogether by identifying them as permitted development, through the General Permitted Development Order (GPDO). LPAs thereby lose any planning control at all - unless they apply successfully for an Article 4 Direction, suspending the permitted development of HMOs in a designated area.

4.4 But such an application is fraught with difficulties. The application process itself is laborious and resource-intensive, and may well involve a Public Inquiry. The decision is out of the hands of the LPA, and subject to central government judgement. And the local authority becomes liable to compensation claims, where HMOs are refused. (Leeds' experience of such processes is not encouraging. Its first application for a Regulation 7 Direction on letting boards was refused. A second application was accepted, after a Public Inquiry. The Direction has not yet been renewed, one year after the renewal application was submitted.)

Q5. Do practitioners have a preference for one approach listed as part of option 2 over the other?

5.1 The key problem with the current UCO is not to do with numbers of occupants, but with their relationships. If Planning Inspectors have no difficulty in accepting eight unrelated occupants as a 'single household' (see **2.2** above), then it seems unlikely that smaller numbers would pose any problems. Lowering the threshold to three persons, as proposed in *Consultation* para37, therefore makes no contribution to improving the effectiveness of the UCO.

5.2 On the other hand, the second variant of Option 2, in *Consultation* para38, addresses the key problem directly. Currently, the idea of 'single household' is undefined. Planning Inspectors have resorted to a functional interpretation ('do the occupants share facilities?'). Any shared house is thereby regarded as a single household. However, in normal usage, the term 'shared house' indicates that sharing takes place precisely because the occupants are *not* a single household (typically, they are a family). The definition in the Housing Act 2004 adopts this structural definition, which thereby captures HMOs unambiguously.

5.3 The second variant goes on to remove newly-defined HMOs from any of the present Use Classes - thereby subjecting them to a need for planning permission, and placing them within the planning control of the LPA.

Q6. What effect would a change to the Use Classes Order as described in option 2 have on those local planning authorities that do not encounter problems with high concentrations of HMOs?

6 None. If a LPA had no problems with HMOs, then Option 2 would make little difference. HMO applications could simply be processed as normal. If a LPA wished to encourage HMOs, it could simply adopt a local planning policy to that effect - as indeed the London Borough of Richmond upon Thames has done (UDP, Policy HSG 15, "The Council will consider favourably applications for new non self-contained accommodation.")

Q7. Would a change to the Use Class Order as described in option 2 or 3 have an impact on the homeless and other vulnerable groups?

7.1 Yes, a positive impact. Insofar as the changes to the UCO proposed in Options 2 and 3 increase LPAs' capacity to manage the provision of HMOs, then these changes should be advantageous to the homeless and others. In the present market free-for-all, many HMO landlords target wealthier markets, like young professionals and students - at the expense of the homeless. In Leeds, demand for investment properties in Headingley has inflated prices disproportionately, and the area has become one of the least affordable in the city. Improved controls would allow LPAs to make better provision for vulnerable groups like the homeless.

7.2 Furthermore, many HMOs are in fact effectively used as second homes, when they are occupied by students on a seasonal basis, as temporary term-time accommodation. This demand places additional pressure on the housing stock generally. In Leeds, there are nearly 25,000 people on the Council's housing list, while some 25-30,000 students are accommodated in houses in and around Headingley. First homes for families are replaced by second homes for students.

Q8. Would a change to the Use Classes Order as described in option 2 or 3 have any unintended consequences, for example an impact on small scale care homes or children's homes, which are currently classed a C3 dwelling houses?

8 No. Para38 of the *Consultation* proposes an amendment to the UCO which would take care of the impact of Options 2 or 3 on smaller scale care homes or children's homes. There may be other unintended consequences - if so, they must be set against the consequences (surely unintended) of current legislation.

Q9. Would a change to the Use Classes Order as described in option 2 or 3 impact unfairly – directly or indirectly – on any equality strands?

9 No. “The planning system is about land use impacts and does not differentiate between different types of occupant” (*Consultation*, paraA71). It should not therefore imply any inequalities. In fact, the current planning framework does give rise to inequality. Concentrations of HMOs represent an extreme of social polarisation, which excludes single households, owner-occupation and social renting, and children and the elderly. At the Census 2001, in Headingley Ward, owner-occupation and both school-children and pensioners comprised only a third of the average proportion of the population. Change to the UCO would enable LPAs to promote housing mix - which is after all, national policy (PPS3).

Q10. Would a change to the Use Classes order reduce the supply of HMO accommodation in your area?

10 No. The need for planning permission might discourage some HMO developers in Headingley (but if they are so easily discouraged, this may be just as well). In fact, in conjunction with local planning policies (UDP, Policy H15, Area of Housing Mix), the Council would be able to resist further intensification and extension of the present concentrations. But change to the UCO need have no impact on supply in other parts of the city. On the contrary, it would enable the Council better to manage the supply and distribution of HMOs in Leeds.

Q11. If amendments are made to the Use Classes Order, should a property that has obtained planning permission for use as an HMO require planning permission to revert back to a C3 dwelling house?

11 No. The consultation on HMOs is prompted by the need to address the acknowledged problem of concentrations of HMOs. Reversion from HMOs to Class C3 should therefore be encouraged - and planning permission should not be required. In Headingley, the local Area Committee is preparing a local Housing Strategy to encourage restoration of the area. The GPDO could be amended so that change from HMO to Class C3 is ‘permitted development’.

Q12. Would a change to the Use Classes Order as described in option 3 place a new burden on local planning authorities?

12 Definitely. Option 3 would place heavy burdens on LPAs who wished to manage HMOs. First, they would have to engage in the costly process of seeking an Article 4 Direction. Secondly, they would lose the fees which currently cover the costs of planning applications.

Q13. Under option 3, would the removal of the current requirement for HMOs to seek planning permission pose a problem for practitioners in managing land use impacts in their area?

13 Certainly. Option 3 would remove from all LPAs the ability to tackle inappropriate one-off HMO developments, as is pointed out in *Consultation* paraA51. Those who wished to encourage HMOs would lose any leverage. Those who wished to discourage concentrations would be dependent on successfully applying for an Article 4 Direction.

Q14. Should the compensation provisions included in Section 189 of the Planning Act 2008 be applied to change of use between C3 dwelling house and an HMO if option 3 were to be implemented?

14 Yes. Since potential compensation claims would be a major disincentive to LPAs to apply for an Article 4 Direction, then any means to minimise these should be adopted - including Section 189 of the Planning Act 2008.

Q15. How important would the risk of compensation be in the decision to use Article 4 directions under option 3?

15 The answers to Q4 and Q14 have already indicated that the potential compensation costs to LPAs of Option 3 would be prohibitive, and a decisive deterrent to using Article 4 Directions. In Headingley, the local housing stock has been heavily mined by landlords and investors, for the high rental returns that can be gained. It seems unlikely that they would miss any opportunity to defend this source of profit.

Q16. Would the extra certainty of greater control bring benefits that outweigh the burdens placed by the need to process more planning applications?

16.1 Yes, certainly. The burdens placed by the need to process more planning applications under Option 2 are negligible. The *Consultation* itself makes clear that “local planning authorities are assumed to have no additional costs given that the fees cover the administrative costs” (paraA36).

16.2 However, the benefits brought by the extra certainty of greater control under Option 2 are enormous. These benefits arise from the savings made by avoiding the costs of concentrations of HMOs. In and around Headingley, these costs are wide-ranging. The Council’s local Area Committee is commissioning research into the actual costs. These include -

- Staffing of the Council’s Noise Nuisance service;
- Management of the two universities’ joint Neighbourhood Helpline;
- Extra waste disposal and street cleansing, as well as clearing ill-managed waste (a dedicated Headingley Streetscene service was introduced, but it proved unable to cope); last year, an extra 250 tons of waste were collected in Headingley during the student exodus; this year (2009) daily collections took place;
- Tackling rodent infestation;
- Removing fly-posting and graffiti;
- Additional policing, especially at the beginning of the academic year (special services like Walksafe are staged), and coping with burglary throughout; meanwhile, PC Carole Munsey has been appointed Student Liason Officer for the NW Inner Area of Leeds Policing Division;
- Casualisation of the local economy, and loss of income during vacations;
- Management of traffic and parking problems;
- Intensive demand on public services, not only policing and environmental health, but also housing, planning, etc;

- Appointment of a full-time dedicated Community Planner in Inner NW Leeds;
- Loss of social capital, which keeps neighbourhoods clean, quiet and safe;
- Extra investment of time by local authority and university officers in liaison, consultation, planning, implementation, etc, for instance, the Shared Housing Group and the Students & Community Group;
- Development of dedicated policies on housing, planning, licensing, environment, etc; Headingley is highly regulated, having not only Policy H15 in the UDP, but also a Cumulative Impact Policy, a Designated Public Places Order, a Regulation 7 Direction on Letting Boards, a Flyer Control Zone, flyposting controls, and so on;
- Extra policing, by police and by council officers during freshers week and changeover, at the beginning and end of the academic year.
- Restoring HMOs as family homes.

Impact Assessment

Do you think that the impact assessment broadly captures the types and levels of costs associated with the policy options? If not why?

a. No, the actual costs associated with the three policy options are not really reflected in the impact assessment. In the case of Option 1, the costs are seriously under-estimated. No transition costs are included - but if best practice is to be disseminated, then new measures will need to be introduced to do so (some exist already, but unless more are developed, then this Option effectively amounts to 'do nothing'). The on-going costs of good practice are said to be 'small' (*Consultation* parasA28-A29), but they do include full-time appointments, as well as considerable input by other LA and HEI officers (and they rely on voluntary action by residents and students) (see **16.2** above). No account is taken of the fact that in non-university towns, HEI best practice does not exist, and would have to start from scratch. Finally, the *Consultation* itself recognises in paraA31 that this Option "would not be able to prevent the clustering of HMOs" - that is, it could not prevent 'the problem under consideration' extending further, and therefore increasing costs.

b. Contrariwise, in some ways the costs of Option 2 are over-estimated. The cost of planning applications is not a cost to local authorities (and is a cost that most other forms of residential development incur - HMO conversions are currently privileged in this respect). Contrary to *Consultation* paraA37, since permission would not be retrospective, there would be no "loss of HMO stock." Other costs raised in parasA39-A41 are speculative, and actually unrealistic. On-going management problems (paraA42) are not peculiar to this Option - they apply to them all.

c. Again, the costs of Option 3 are seriously under-estimated. As with Option 1, there are in fact transition costs - in this case, the costs of preparing, submitting, defending and implementing an Article 4 Direction. But most serious is the cost to the LPA of compensation claims. HMO investors are unlikely to forego the opportunities for claims, and these would be prohibitive for the LPA - and decisive in negating this measure as an Option. The loss of any control at all over HMOs also represents a potential on-going cost, as is recognised in paraA51: "This could incentivise the creation of larger HMOs in areas where there isn't a more general problem."

Do you think that the impact assessment broadly captures the types and levels of benefits associated with the policy options? If not why?

d. Again, no. The actual benefits associated with the three policy options are not really reflected in the impact assessment. In the case of Option 1, the benefits are over-estimated, quite optimistically. There is in fact nothing to suggest that Option would go any way beyond the 'do nothing' baseline (*Consultation* paraA20), in university or in other towns - in which case, there are no benefits at all.

e. The benefits of Option 2 will never actually be directly apparent, and they are therefore under-estimated by the impact assessment. The benefits will consist of the cost-savings made. First of all, these will be made from the prevention of further concentrations of HMOs, either in existing areas or in new areas. In the long term, they will be made where concentrations are reclaimed - and the Option will enable the LPA to resist any reversal. All the costs currently incurred in such areas (as outlined in **16.2** above) represent the savings made, and therefore the benefits gained.

f. Option 3 potentially represents the same benefits as Option 2 - though with far less likelihood.

Do you agree that the impact assessment reflects the main impacts that particular sectors and groups are likely to experience as a result of the policy options? If not why not?

g. No, the impacts of the policy options on particular groups are not reflected in the impact assessment. For instance, with regard to *Consultation* paraA67, concentrations of HMOs are of major significance for sustainable development. They damage the sustainability of communities in respect of all the government's criteria -

- their transient populations undermine *inclusion* (as shown in Headingley by the Sheffield report);
- the same transience leads to disengagement, so they are not *well run* (Headingley Ward's electoral turnout is the lowest in the city);
- they seriously damage the *environment* (see **h** below);
- commercial exploitation means the neighbourhood is no longer *well-designed* (residents are preparing a Neighbourhood Design Statement for Headingley, to protect its character);
- fluctuating demand (in university towns) threatens *connectivity*;
- local economies *thrive* only in term-time;
- extreme demands are made on local *services*; and
- the domination of the area by HMOs means that it is no longer *fair for everyone* (many social groups are excluded, see **9** above and **j** below).

By addressing these issues, Option 2 will actually *improve* sustainable development.

h. As indicated above, HMOs' most visible impact is on the environment - in terms of waste disposal (or the lack of), of degradation of buildings and gardens, and of street blight (graffiti, flyposting, letting boards, security grilles). Regarding *Consultation* paraA68 therefore, controls on HMOs, as proposed in Option 2, if effective, should have significant environmental consequences. (It is notable that much 'good practice' is addressed to the environmental consequences of HMOs, such as student 'clean-ups'.)

i. Regarding *Consultation* paraA70, HMOs impact on health - both public health (rodent infestations) and personal health (the culture of HMO concentrations often encourages alcohol and other forms of abuse - in Headingley, a notorious pub-crawl known as the Otley Run regularly blights the streets).

- j.** HMO concentrations do not impact on race, disability or gender inequality (*Consultation* parasA71-A76). They do however give rise to inequality in other sectors. Contrary to the principles of ‘housing mix’ (as spelled out in PPS3), HMO concentrations (by definition) exclude owner-occupation and social renting. They thereby exclude also single households. And since families comprise a range of generations, they also exclude children and the elderly (see **9** above). Controls on HMOs therefore would actually promote equality of opportunity.
- k.** Another impact on equality refers to access to housing. Social justice should assume that everyone was entitled to be adequately housed before anyone acquired a second home. Yet many HMOs (like student shared houses) are in fact second homes (occupied in term-time only). Controls on HMOs would enable local authorities to protect their housing stock from this form of inequality (see **7.2** above).
- l.** HMOs also raise issues of human rights (*Consultation* paraA77). Article 1 of the First Protocol of the Human Rights Act 1998 asserts that “every person is entitled to the peaceful enjoyment of his possessions.” However, many residents surrounded by concentrations of HMOs lose this basic right to the ‘peaceful enjoyment’ of their homes (it is a major complaint to the local Neighbourhood Helpline and to the Noise Nuisance service in Headingley). Again, therefore, controls on HMOs would have a positive human rights impact.

Conclusion

The policy options proposed in the *Consultation* are not *sufficient* to solve 'the problem under consideration' (Table, p20). For this problem to be resolved fully, measures to restrain continued demand for HMOs need to be introduced (such as Leeds' UDP Policy H15), and so do measures to restore areas of concentration to areas of housing mix (such as Headingley's local Housing Strategy). Such measures are beyond the scope of the present *Consultation*. But all the *Consultation* policy options (in some respect) are absolutely *necessary* to solve 'the problem under consideration.' Article 4 Directions (Option 3) could restrain the abuse of the built environment, and good practice (Option 1), well under way in Leeds, will remain necessary for the on-going management of the symptoms of the problem. But only Option 2, reform of the Use Classes Order, will actually address the root causes. Therefore, Leeds HMO Lobby formally requests Communities & Local Government to adopt Option 2, and to -

- a) introduce into the Town & Country Planning (Use Classes) Order 1987 a definition of HMO the same as that in the Housing Act 2004;
- b) remove HMOs from Use Class C3, classing them either as a new Use Class C4 or explicitly as *sui generis* in paragraph 3(6) of the Order;
- c) add a new class of permitted development of HMO to Class C3 in Part 3 of Schedule 2 of the Town & Country Planning (General Permitted Development) Order 1995.

Appendix A Student Settlement

Leeds HMO Lobby, *South Headingley Student Settlement, 2007*

The main student settlement in Leeds occupies about a quarter square mile in South Headingley, from Woodhouse Moor to the Harrogate Railway line, between Victoria Road and Royal Park Road, with extensions up Headingley Hill and down Cardigan Road. The area was covered by twenty-four Output Areas in the Census of 2001, one-third of Headingley Ward (as it then was). 72 streets in ten blocks were occupied by a total population of some 10,000: in each street, students comprised between 50% and 100%; overall, in the area, about two-thirds of the population were students. (Census data provided to Leeds HMO Lobby by Leeds City Council).

Street	Output Area	Students
South Hyde Park	DAFN0017	57%
Ash Grove	DAFN0018	62%
Ebberston Terrace	DAFN0030	62%
Hyde Park Terrace		
Kensington Terrace		
Midland Road		
Brudenell Grove	DAFN0001	53%
Brudenell Avenue	DAFN0023	58%
Brudenell Grove	DAFN0033	64%
Brudenell Mount	DAFN0034	74%
Brudenell Street	DAFN0037	57%
Brudenell View		
Royal Park Avenue		
Royal Park Mount		
Royal Park Terrace		
Royal Park View		
Wrangthorn Avenue		
Wrangthorn Terrace		
Weltons	DAFN0019	54%
Chestnut Avenue	DAFN0025	86%
Chestnut Grove	DAFN0026	55%
School View		
Welton Grove		
Welton Mount		
Welton Place		
Welton Road		
Hessles	DAFN0021	75%
Hessle Avenue	DAFN0031	67%
Hessle Mount		
Hessle Place	<i>overall</i>	72%
Hessle Road		
Hessle Street		
Hessle Terrace		
Hessle View		
Hessle Walk		
Pearsons	DAFN0035	62%
Pearson Grove		
Pearson Avenue		
Pearson Terrace		
John Street		
Elizabeth Street		
William Street		
Meadow View		
Thornville Crescent		

Street	Output Area	Students
Norwoods	DAFN0020	72%
Norwood Grove	DAFN0024	69%
Norwood Place		
Norwood Road	<i>overall</i>	70%
Norwood Terrace		
Winstanley Terrace		
Mayvilles	DAFN0003	65%
Cardigan Lane	DAFN0022	50%
Mayville Road	DAFN0032	58%
Mayville Street		
Mayville Place		
Mayville Terrace		
Mayville Avenue		
Walmsley Road		
Ashvilles	DAFN0036	66%
Ashville Road		
Ashville Terrace		
Ashville Avenue		
Ashville Grove		
Ashville View		
Headingley Hill	DAFN0072	70%
Manor Drive	DAFN0073	84%
Manor Terrace	DAFN0076	65%
Manor View		
Norville Terrace	<i>overall</i>	73%
Richmond Avenue		
Richmond Mount		
Richmond Road		
Beamsleys	DAFN0038	53%
Beamsley Grove		
Beamsley Mount		
Beamsley Place		
Beamsley Terrace		
Through Roads		
Brudenell Road		
Cardigan Road (part)		
Hyde Park Road (part)		
Queens Road (part)		
Royal Park Road		
Victoria Road		
72 streets		64% students

Appendix B Evidence

Extract from Leeds HMO Lobby, *Proof of Evidence*, presented to Public Inquiry, Appeal Number APP/N4720/A/08/2074675/NWF, Leeds, 8-10 October 2008

3 Community The neighbourhoods in & around Headingley (encompassed by the Area of Housing Mix) manifest both polarisation of the community (an overwhelming lack of balance or mix) and the social, environmental and economic consequences (long-term loss of sustainability).

3.1 Demographically, Headingley is unbalanced (or polarised). The demographic peculiarities make precise and comprehensive data difficult to compile (itself a symptom of the problems which arise). The latest source of evidence is the Census of 2001.

3.1.1 In terms of housing tenure, the Census reveals Headingley Ward to be polarised. The national norm is for 70% of properties to be owner-occupied, 20% to be socially rented, and 10% to be privately rented. The city of Leeds as a whole corresponds to the national norms (69%, 19% and 12% respectively). In Headingley Ward, however, the normal balance is turned on its head: only 25% is owner-occupied, and 16% is socially rented - but 59% is privately rented.

3.1.2 Again, in terms of households, the Census reveals Headingley Ward to be polarised. Nationally, 70% of the population are (or were) married, and 30% are single. In Headingley, the situation is reversed - only 20% are/were married, and 80% are single. Consequently, one-person households are much higher than the norm (40% rather than 30%), and those with children much lower (10% instead of 30%). But the real polarisation is towards multiple occupation. LCC's Houses in Multiple Occupation (HMO) Team estimates that there are approximately 2,500 HMOs in the Ward (1,350 are licensed), which indicates that about half the population lives in HMOs (if the average occupancy of HMOs is five persons, and the population of the Ward is about 25,000).

3.1.3 The consequence of housing polarisation is demographic polarisation. The distinctive demography is intimately connected with the distinctive housing profile. Private renting has the shortest occupancy of any tenure, on average eighteen months. Most renting in the Ward is HMOs, and most of these are shared student houses. The population therefore is young, transient and seasonal.

(a) The local population is overwhelmingly youthful. Nationally, approximately one-fifth of the population occupies each of five fifteen-year age-bands - thus school-children (under 16) comprise 20% of the population, as do those aged 60 or more. However, in Headingley Ward, only 8% are 60 plus, and only 7% are school-children. On the other hand, 69% are in the 16-30 age band. Clearly, on this basis, the local population is quite unable to renew itself naturally. (The imbalance of course is uneven. A breakdown of the Census figures by Output Area shows South Headingley to be most polarised. Here, 72 streets each house a majority of students; in many, the proportion exceeds 75%; and some indeed are virtually entirely occupied by students, such as Manor Drive or Chestnut Avenue.)

(b) The local population is overwhelmingly transient. Electoral registration figures used to provide a useful guide. Until 2001, they were compiled and published annually. In most wards, the number of newly-registered electors is somewhat below 10% (comprising those coming of age, or moving into the ward). However, figures from the Electoral Registration Office in Leeds show that in 1991, the proportion of new electors in Headingley was already double the usual figure at 19%. During the decade, it increased steadily, and by 2001, half of the electors (49%) were new to the Ward.

(c) The local population is also overwhelmingly seasonal. Figures are not readily found. But experiential evidence shows that public places (streets, shops) are heavily-used in term time, and under-populated during university vacations. This could be confirmed by local retailers.

It is very evident in local streets, when houses are shuttered and in darkness at holiday times, like Christmas.

3.2 There is good reason for policy supporting mixed or balanced communities. This is confirmed in Headingley, on the one hand by increased problems, and on the other, by a weakened community to provide solutions. In order to cope with these problems, LCC's Inner NW Area Committee (INWAC) has established a dedicated sub-committee, the Students & Community Group, comprising councillors, residents and services, to devise policy, implement actions and monitor developments.

3.2.1 Problems in & around Headingley exacerbated directly or indirectly by imbalance are social, environmental and economic.

(a) Low-level antisocial behaviour is endemic in term-time, comprising noise nuisance, minor vandalism, evacuation, and public drunkenness, and arises from a population predominance of teenagers and young adults. Such incidents are not recorded. But serious crime is, and figures from Safer Leeds identify Headingley as one of six burglary hot-spots in the city. In fact, the Headingley hotspot is larger than all the other five put together, both in terms of the size of the area and of the number of offences. Other records show that the high numbers of vulnerable households attract burglars from well outside the local area, which is not usually the case.

(b) Waste disposal has long been a problem in & around Headingley. LCC commissioned a survey from ENCAMS which identified Headingley as the filthiest ward in the city. Accordingly, Headingley Streetscene was initiated, a new system for waste disposal. It is now defunct: on the one hand, it was very resource-intensive; on the other, it failed to take account of the need for continuous renewal, due to population transience. Meanwhile, demand for HMOs has impacted on the quality of the built environment, in terms of infill development, alterations and extensions, loss of features and inappropriate additions (grilles, dishes), and neglect and concreting of curtilages. A Neighbourhood Design Statement is under way, to mitigate the effects.

(c) Demographic polarisation brings with it distinctive market pressures. Retailing in & around Headingley has been described as a 'resort economy', being both seasonal and with a particular orientation towards letting agencies (sixty in the area), bars and take-aways. In consequence, Headingley is probably the most regulated suburb in the city: it not only has the Area of Housing Mix, but also a Cumulative Impact Policy (covering all licensed premises, bars and take-aways) and a Designated Public Places Order (with extensions under consideration), a Direction on Letting Boards and a Flyer Control Zone, and Additional HMO Licensing under consideration.

(d) Car parking is a generic problem which impacts on social, environmental and economic issues. It obstructs pavements for pedestrians, and access by emergency vehicles, cleansing, buses and residents. Research shows that HMOs occupied by students have higher-than-average car ownership, twice the city average in fact. A number of Residents Parking Zones are in place, and more are planned.

3.2.2 The community itself, and therefore its capacity to respond to problems, is weakened by demographic imbalance. This is understood experientially by settled residents. It is they who act in the interest of the community to which they belong. Lacking this sense of membership, the transient population does not. This is manifest in all spheres, but it is clearly documented in the level of civic engagement demonstrated by turnout at local elections. For several years now, Headingley Ward has furnished the lowest turnout, falling below 20% (19.7% in 2008, 17.8% in 2007, 18.9% in 2006, 9.5% in by-election 2005).

Appendix C Anomie in Headingley

Extract from Headingley Development Trust, *Anomie in Headingley*, December 2008

On 1 December 2008, the Social & Spatial Inequalities Research Group in the Department of Geography at the University of Sheffield published *Changing UK: the way we live now*. The survey was commissioned by the BBC, and was reported that day on the national news. It considers changes over the past forty years in a range of aspects of social life. The aspect which particularly caught attention in the news report was what the researchers called the 'anomie index', that is, 'the feeling of not belonging.' The researchers conclude that an increase in anomie weakens the 'social glue' of communities.

The neighbourhoods revealed as having the deepest roots are the Bramhall area of Stockport in Greater Manchester, Charnwood West near Leicester, Sefton on Merseyside, Upminster in east London and Washington in Sunderland. The locality with the shallowest community roots is Holyrood in Edinburgh. Other places scoring poorly include Headingley in Leeds, the Hyde Park area of London and the university area of Cardiff.

The Holyrood area has an anomie index of 86.6%. Headingley is second in Britain with 72.2%. The index is based on an analysis of social fragmentation. In Headingley, for instance, two-thirds of the population in 2001 were non-married adults. 17% were in one-person households. 43% were at a different address a year before. And 44% were in privately rented accommodation. Calculations based on these figures produce the anomie index.

In 1991, the index was 48.2%. In 1981 it was 30.7%. And in 1971 it was 29.4%. Thus, the index was static during the '70s and '80s. In 1991, it jumped 60%, and in 2001, another 50%.

These figures are closely related to demographic segregation: half of the people in Headingley in 2006 were estimated to be in their twenties, and 40% were aged 20-24. In 2001, this was 40% (and 32%). In 1991, it was one-third. And in 1981 and 1971, it was one-fifth.

The BBC report notes that one key factor in reducing the sense of belonging in a community is having a large student population. This is confirmed, first, by the rapid changes recently in Headingley, coincident with the expansion of higher education. Further, it is confirmed by the fact that all but one of the half-dozen areas with the highest anomie indices have significant student populations -

<i>Tract</i>	<i>Index</i>	<i>Number</i>
Edinburgh Holyrood	86.6	(2192)
Leeds Headingley	72.2	(1382)
London Hyde Park	71.3	(1029)
Cardiff Cathays	70.1	(2073)
Glasgow University	69.4	(2217)
Brighton Central	64.8	(1602)

Changing UK: the way we live now is available online at <http://sasi.group.shef.ac.uk/research/changingUK.html>; for data on the tracts, follow the link to 'Data at lower geographical levels.' The BBC report is available at <http://news.bbc.co.uk/go/pr/fr/-/1/hi/uk/7755641.stm>

Appendix D SHAP

Leeds City Council, *Shared Housing Action Plan*, revised 2008

Objectives

1. To increase the sustainability of the Area of Housing Mix.
2. To reduce the number of students in full-time education accommodated within the Area of Housing Mix as a proportion of the population, by the Census in 2011
3. To increase the proportion of students in full-time education accommodated outside Area of Housing Mix by 2011
4. To increase the range of opportunities for student housing in Leeds.

	Actions by theme	Lead agency
	Housing	
1	Pursue a Student Housing Strategy incorporating the plans and strategies of the Higher Education Institutions. <ul style="list-style-type: none"> ▪ Identify significant developments relevant to the Strategy ▪ Make representations on these to appropriate bodies ▪ Report on & review the Strategy annually (September 2008) 	Re'new, Shared Housing Group
2	Encourage the development of student housing outside Inner NW Leeds <ul style="list-style-type: none"> ▪ Request that Policy H15A be considered as part of the LDF Area Action Plans as appropriate. ▪ Report on implementation of Policy H15A in 2007 (January 2008) and in 2007-2008 (September 2008) 	Development Department with support of Shared Housing Group
3	Pursue Policy H15 of the Unitary Development Plan <ul style="list-style-type: none"> • Identify & evaluate significant accommodation developments in the Area of Housing Mix • Make representations to Plans Panel West on such developments • Report on relevant applications made in 2007 (January 2008) and in 2007-2008 (September 2008) 	Planning Sub Group
4	Maintain appointment of Community Planning Officer. <ul style="list-style-type: none"> ▪ To request a decision from the Chief Planning Officer on mainstreaming the post within the Development Dept. 	Inner North West Area Management
5	Develop & monitor a Housing Strategy for the Area of Housing Mix, to achieve more affordable housing & a more balanced community <ul style="list-style-type: none"> • Production of a Strategy (Spring 2008) • Review of Strategy (September 2008) 	Area Management
5A	Develop an Inner NW Area Action Plan within Local Development Framework. <ul style="list-style-type: none"> ▪ Design a Profile for an Area Action Plan DPD; ▪ Begin preparation and production of DPD. 	Development Department, Planning Sub Group
	Management of areas with students	
	Community	
6	Communicate with students via publications and inductions,	Unipol, Student

	<p>issues on housing dispersal, transport and the 'Community Code'.</p> <ul style="list-style-type: none"> ▪ Pursue communication with students and the wider community through Knowledge ▪ Undertake annual reviews of Community Strategies ▪ Production of a range of information for students as part of induction/registration activities 	Unions, Universities [refer to UL, LMU, TASC – HEIs and SUs]
7	<p>Develop plans to promote the regeneration of the Area of Housing Mix.</p> <ul style="list-style-type: none"> ▪ Consideration and evaluation of the 'Leeds Left Bank' proposal, with a view to establishing deliverable actions for the District Partnership. ▪ Report on progress (September 2008) 	Area Management
8	<p>Pursue the implementation of 'Headingley Renaissance'.</p> <ul style="list-style-type: none"> ▪ Report on implementation annually (September 2008) ▪ Re-establish Central Headingley Strategy Group 	Area Management
9	<p>Manage student arrivals and departures.</p> <ul style="list-style-type: none"> • Co-ordinate agencies to manage student arrivals in September • Co-ordinate agencies to manage student departures and accommodation changeover in July • Create and publicise a directory of key contacts responsible for streetscene, community safety, etc., in the Area of Housing Mix • Area Management and SHG to receive and annual report on student arrivals (November 2007) and departures (September 2008), including enforcement actions and streetscene resources. 	Area Management
Social		
10	<p>Pursue noise nuisance initiatives</p> <ul style="list-style-type: none"> ▪ Review noise nuisance strategies ▪ Undertake a major noise awareness initiative to coincide with Noise Action Week 	Env't Health
11	<p>Pursue neighbourhood policing arrangements in the Area of Housing Mix.</p> <ul style="list-style-type: none"> ▪ Identify targets for crime reduction ▪ Review crime reduction strategies ▪ Report on policing in Inner NW Leeds (September 2008) 	West Yorkshire Police
12	<p>Increase awareness of how to access University complaints procedures and the disciplinary process.</p> <ul style="list-style-type: none"> ▪ Promotion of the Neighbourhood Helpline. ▪ Production of an annual report on the Neighbourhood Helpline and the handling of complaints (September 2008) 	Universities
Environment		
13	<p>Review and improve cleansing practices in the Area of Housing Mix.</p> <ul style="list-style-type: none"> ▪ Review cleansing strategies ▪ Create and publicise a directory of key contacts responsible for streetscene and community safety in the Area of Housing Mix [remove to 9] 	Area Committee & Streetscene Services

	<ul style="list-style-type: none"> ▪ Report on cleansing action annually (September 2008) 	
14	<p>Pursue Direction on letting boards in Inner NW Leeds</p> <ul style="list-style-type: none"> ▪ Undertake a review of the Direction on Letting boards ▪ Ensure the continuation of the Direction on letting boards 	Development Department
15	<p>Pursue implementation of Resident Parking Zones.</p> <ul style="list-style-type: none"> ▪ Transport Sub Group to prioritise initiatives to tackle parking issues in the area. ▪ Areas of need to be identified and referred to Highways for consideration. ▪ Report on progress of RPZs (September 2008) 	Transport Sub Group
16	<p>Consider extending Unipol's annual garden survey and awards.</p> <ul style="list-style-type: none"> ▪ Extend garden surveys and award scheme 	Unipol
Economy		
17	<p>Promote a sustainable and balanced economy to ensure the long term vitality and viability of Headingley town centre and the surrounding area.</p> <ul style="list-style-type: none"> ▪ Monitor significant retail applications within Headingley Town Centre, and other District Centres within the Area of Housing Mix; ▪ Make recommendations to Plans Panel West, in accordance with objectives ▪ Review of Headingley CIP to include takeaway food [done?] 	Development Department & Planning Sub Group
18	<p>Improve the range of outlets and the visual character of shopping areas within the Area of Housing Mix</p> <ul style="list-style-type: none"> ▪ Pursue Town and District Centre Schemes in Headingley and Kirkstall ▪ Consider schemes to improve the visual character of smaller parade and shopping areas. 	Area Management
19	<p>Monitor and enforce alcohol-related policies in Headingley town centre</p> <ul style="list-style-type: none"> ▪ Enforce the Headingley DPPO which bans on-street drinking in Headingley Town Centre. ▪ Support the Cumulative Impact Policy with appropriate representations ▪ Report on DPPO and CIP (September 2008) 	West Yorkshire Police Entertainment Licensing
Private rented sector		
20	<p>Pursue HMO Licensing in the Area of Housing Mix.</p> <ul style="list-style-type: none"> ▪ Review the impact of Mandatory HMO Licensing ▪ Submit report for discussion to Shared Housing Group on the impact of HMO Licensing and the need/scope for Additional Licensing (April 2008) 	Env't Health
21	<p>Develop the contribution of the private rented sector to community sustainability through accreditation schemes.</p> <ul style="list-style-type: none"> ▪ Increase the number of bedspaces covered by either LCC or Unipol Accreditation scheme to 21,000 by 2010 (city wide) and introduce an Accredited Managing Agent Scheme ▪ Report on review of accreditation scheme with specific community sustainability issues addressed (March 	Env't Health

	2008).	
	Monitoring / Review	
22	Monitor distribution of student accommodation city-wide (within and without the Area of Housing Mix) <ul style="list-style-type: none"> ▪ Analysis and map of student residence (January 2008) ▪ Comparison to analysis of 3 years ago (January 2008) 	Re'new and Planning
23	Monitor social impacts in the neighbourhoods within the Area of Housing Mix including crime, antisocial behaviour, and noise nuisance. <ul style="list-style-type: none"> ▪ Identification of trends in selected indicators relating to crime, anti-social behaviour and noise nuisance ▪ Future monitoring reports on selected indicators and trends (April 2008) 	Area Management
24	Monitor environmental impacts in the neighbourhoods within the Area of Housing Mix including annual streetscene report, Unipol's annual garden survey, annual report on development control & compliance (September 2008) <ul style="list-style-type: none"> ▪ Streetscene – Encams survey to be used as baseline. ▪ Results of Unipol's annual garden survey (September 2008) 	Area Management, Streetscene, Unipol and Development
25	Monitor economic impacts in Inner North West including annual reports on local economy, and on local Cumulative Impact Policy. <ul style="list-style-type: none"> ▪ Annual report (September 2008) 	Community Planning Officer

REVIEW

- (a) Review how far SHAP has been *effected*, against outcomes.
- (b) Review how far SHAP has been *effective*, against Objectives. (For Objective 1, refer to DCLG's criteria for sustainable communities).
- (c) Evaluate SHAP against SWOT analysis.
- (d) Recommend amendments to SHAP, as necessary.

Appendix E References

- Atkinson, Karen 'Books, Bars and Bother' *Julian Worricker and 5 Live Report*, BBC Radio 5 Live, 28 November 2004
- Chrisafis, Angelique 'Two square miles of housing hell' *The Guardian* 24 October 2000
- Clark, Laura 'Student "ghettos turn suburbs into slums" ', *Daily Mail*, 22 May 2004, p47
- Crossley, Anna 'Shared Housing in Headingley' *Look North*, BBC1 (Yorkshire), 4 April 2006
- CLG *Evidence Gathering - Housing in Multiple Occupation and possible planning responses*, London, September 2008
- CLG *Houses in multiple occupation and possible planning responses: Consultation*, London, May 2009
- The Economist* 'The new blacks', vol 371, no 8376 (22 May 2004) p32
- Flanagan, Ben 'Does anyone get to sleep around here?' *The Observer: Cash* [supplement], 8 May 2006, p16
- Gardiner, Joey 'Housing Studies' *Regeneration & Renewal* 30 September 2005, pp20-21
- Headingley Development Trust, *Anomie in Headingley*, December 2008 [Appendix C]
- Hodges, Lucy 'Students no longer welcome' *The Independent: Education & Careers* [supplement] (21 October 2004) pp6-7
- Housing Act 2004
- Human Rights Act 1998
- Huston, Danny 'Students in Headingley' *Look North*, BBC1, 26 February 2008
- Johnson, Andy 'Students in Headingley' BBC3 News, 9 June 2004
- LCC *Leeds Landlord Accreditation Scheme*, 1997, revised 2007
- LCC *Shared Housing in Leeds White Paper*, 28 Feb 2001
- LCC *2001 Census Output Areas where students living independently exceed 10% of the population, 2004* [Appendix F]
- LCC *UDP Review*, 19 July 2006
- LCC *Regulation 7 Direction on Letting Boards*, 2006
- LCC Shared Housing Group, established 2001
- LCC Shared Housing Group *Shared Housing Action Plan (SHAP)* 2001, revised 2006, 2007, 2008 [Appendix D]
- LCC Shared Housing Group *A Strategy for Housing Students in Leeds* 2007
- LCC INWAC Students & Community Group
- LCC INWAC *Headingley Renaissance* 2005
- LCC INWAC *Headingley Neighbourhood Design Statement* in preparation
- LCC INWAC *Housing Strategy for the Area of Housing Mix* in preparation
- Leeds HMO Lobby, *South Headingley Student Settlement*, 2007 [Appendix A]
- Leeds HMO Lobby, *Proof of Evidence*, presented to Public Inquiry, Appeal Number APP/N4720/A/08/2074675/NWF, Leeds, 8-10 October 2008 [Appendix B]

- Michael, McCarthy, 'Growing army of undergraduates transforms run-down urban areas for better and worse' *Independent* 6 September 2003
- Midgley, Carol 'Hell of residence' *The Times* 04 December 2002
- Planning Inspectorate, *Appeal Decision: 17 Ash Grove, Leeds*, 10 April 2002
- Planning Inspectorate, *Public Inquiry: Glasssworks, Headingley, Leeds*, 8-10 October 2008; *Appeal Decision*, 19 Nov 08
- Purves, Libby 'Student Lodgings' *The Learning Curve* BBC Radio 4, 15 March 2005
- Sanders, Morland 'The Undergraduates from Hell' *Inside Out*, BBC1 (Yorkshire), 18 October 2004
- Smith, Darren *Processes of Studentification in Leeds* Report to University of Leeds, May 2002
- Soni, Darshna 'Student Exclusion Zone' Channel 4 News, 10 July 2004
- Statutory Instrument 1987 764 *Town & Country Planning (Use Classes) Order*
- Statutory Instrument 1995 418 *Town & Country Planning (General Permitted Development) Order*
- Stott, Martin 'Students in Headingley' *You & Yours* BBC Radio 4, 3 November 2004
- Tingle, Len 'A Suburb of the University' *The Politics Show*, BBC1 (Yorkshire), 12 June 2005
- Unipol Student Homes *Code of Standards*, revised 2009
- University of Leeds *Community Strategy* June 2000
- University of Leeds *Housing Strategy*, March 2004
- University of Leeds *Inner North-West Community Strategy 2007-2012* 2007
- University of Leeds *Housing Strategy Update Report May 2007* 2007
- University of Sheffield *Changing UK: the way we live now* December 2008
- Utle, Alison 'Town and Gown: speaking their language' *Times Higher Education Supplement* 22 August 2003
- Wainwright, Martin 'Border controls for student Shangri-la' *The Guardian* No 49163 (2 October 2004) p12
- Wainwright, Martin 'Locals claim slice of student paradise' *The Guardian* 16 November 2005
- Woodward, Grant 'Families winning the battle of Headingley' *Yorkshire Evening Post*, 5 March 2007

Appendix F Census Output Areas

Leeds City Council, *2001 Census Output Areas where students living independently exceed 10% of the population, 2004*

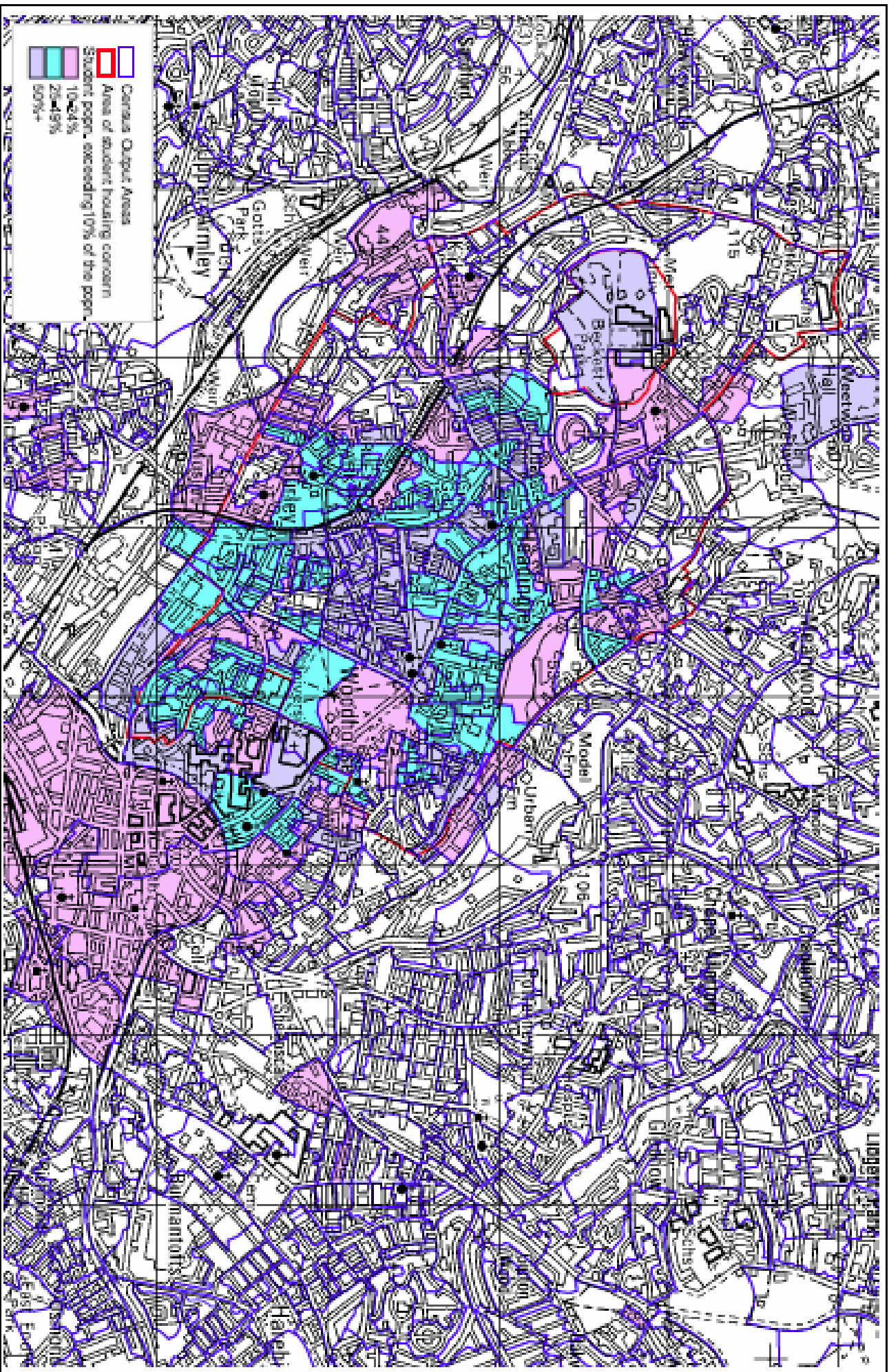
Census Output Areas where student population exceeds 10% of the population:

pink: 10-24%
blue: 25-49%
mauve: 50%+

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30 July 2009



PRODUCED BY THE DEVELOPMENT DEPARTMENT, LEEDS CITY COUNCIL

Scale : 1/30,000

MAP 4



LEEDS
CITY COUNCIL

The map is based upon the Ordnance Survey's Digital Data and the population of the Ordnance Survey system held at the Centre of the Register's statutory office.
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2001 Census Output Areas where students living independently exceed 10% of the population.