

**STATUTORY GUIDANCE ON PLANNING AND SUSTAINABLE
DEVELOPMENT – CONSULTATION PAPER, June 2007**

1a) Dr Angela Montford, 22 The Scores, St Andrews, Fife KY16 9AS

1b) I would like to respond to the consultation paper as Secretary of CSARA, the Confederation of St Andrews Residents Associations.

2a Yes

2b Box 1

3 Yes

4 Yes

While welcoming the consultation paper there is one aspect of community sustainability which we feel would benefit from explicit consideration at an early stage in the consultation process.

In recent years St Andrews in common with many other university cities witnessed a massive increase in the proportion of properties in multiple occupation (HMOs) which has resulted in many adverse effects on the amenity and sustainability of the town and the welfare of its long-term residents. The problems of *Studentification*¹ are now well known and in St Andrews are aggravated by the small size of the town (10,500) in comparison to the number of students, which is now approaching 7000. In some streets HMO saturation is now 95%.

The increasing problems which have affected permanent residents and long-established families has led them to move out of such densely populated HMO areas, rather than attempt to cope with the repeated disruption of their lives, which frequently results when too many young and transient residents are living in close proximity but have different lifestyles and no long-term stake in the community. The number of children in the town is now considerably below the percentage for the rest of Fife and for Scotland as a whole, and a primary school has recently closed. Most of the migration away from the area has occurred within little more than two decades and has tended to accelerate during that time as the resulting vacant properties have been extremely attractive to buy-to-let investors. This situation has aggravated what is already a nationwide shortage of affordable housing for those who wish to work and make their homes in St Andrews, as HMO properties are bought up at a premium price by these, often absentee, buy-to-let landlords.

Any continuation of this destruction of community cohesion and viability runs counter to the Executive's goal that any development should be sustainable and should not compromise the quality of life of present day residents or that of future generations. We note that Paragraph 27 recognises that : "the cumulative impact of some developments,

¹ *'Studentification': a guide to opportunities, challenges and practice*, published by Universities UK in partnership with the Standing Conference of Principals (SCOP) and in association with the Department for Education and Skills (DfES), the Office of the Deputy Prime Minister (ODPM) and the Local Government Association (LGA), 2000.

particularly those that impact on the quality of life in an area, can have negative effects on community confidence and well being.”

We believe that the particular damage done by excessive concentration of HMOs in relatively small urban areas must be identified and catered for in any Statutory Guidance. It should no longer be possible to state that, as some Reporters have done, that HMOs should be viewed as the same kind of development as properties for normal residential use², as this is patently not the case. This fact has already been recognised by Glasgow.³ While licensing of HMOs has improved safety features for tenants, the many deleterious effects of high densities of HMOs has on the community continue to be ignored.

Another associated concern is the requirement to have five objections before a planning objection will be heard by committee. In a town with multiple HMOs, there may be perhaps a dozen student occupied houses and one or two concerned neighbours who might be affected by some planning proposal. It is extremely unlikely that any of the HMO transient tenants will bother to make objections, so the remaining one or two permanent residents are effectively disenfranchised from the democratic process. This does not contribute to the just society emphasised in Section 28.

The Statutory Guidance proposed must recognise the existence of studentification and other problems arising from the presence of multiple HMOs and include measures to ameliorate the damage which is being inflicted on the sustainability of our communities..

- Councils must be given planning powers that enable them to control and limit HMO proliferation and density within their own areas There must be a change in the Use Classes Order to include all HMOs of whatever size, as is now the case in Northern Ireland.
- University student accommodation must be an essential part of any local plan. Universities must no longer be permitted to leave matters to the market, a situation which has resulted in the university take-over such a large proportion of the local housing stock.
- The requirement for five objections before a planning application comes under scrutiny must be reconsidered for areas of high density HMO occupation.

Yours faithfully

Dr Angela Montford
Secretary CSARA

² Planning appeal, various owners, Change of Use to HMO, 11-21 Southfield Court, St Andrews, Reporters' Unit, 28 September 2006, item 18.

³ Glasgow City Plan, Part 2, Development Policies, Section 3, Residential RES 13 Multiple Occupancy, August 2003.