

[REDACTED]

[REDACTED], I submit this comment in support of imposing a 10% 'Houses in Multiple Occupation' (HMO) threshold across Cambridge. I also argue strongly in favour of an Article 4 Direction, ideally covering central Cambridge, but as a minimum covering our neighbourhood in Petersfield.

Why we would like a 10% threshold

The National HMO Lobby has identified 10% of properties as a recognised "tipping point", beyond which evidence indicates that concentrations of HMOs begin to adversely affect the character and balance of a community. See evidence here:

<https://hmolobby.org.uk/39articles.pdf>

As a result, a substantial and growing number of local authorities have adopted policies setting a 10% HMO concentration threshold within a defined radius of the application site. This list includes comparable university towns such as Durham and Bristol.

Cambridge is now an outlier among UK university cities, having neither a defined HMO threshold nor an Article 4 Direction. Many cities have both.

Here is the evidence - please note that my comment continues after this list:

Councils with a 10 % HMO threshold (with evidence links)

1. **Bassetlaw District Council (Draft SPD)**
– 10% harmful concentration test within 100 m.
<https://www.bassetlaw.gov.uk/media/n25jq0eu/houses-in-multiple-occupation-spd.pdf>
2. **Bath and North East Somerset Council**
– 10% concentration test retained in SPD.
<https://beta.bathnes.gov.uk/houses-multiple-occupation-hmos-supplementary-planning-document-spd-public-consultation/hmo>
3. **Birmingham City Council (Draft SPD)**
– 10% threshold applied to HMOs plus exempt accommodation within 100 m.
https://www.birminghambeheard.org.uk/economy/hmo-spd-co-living-spd/supporting_documents/Houses%20in%20Multiple%20Occupation%20Draft%20SPD.pdf
4. **Brighton & Hove City Council**
– 10% radius test widely applied.
<https://www.brighton-hove.gov.uk/planning/planning-applications/planning-permission-houses-multiple-occupation>

5. **Bristol City Council**
 - 10% neighbourhood threshold in HMO SPD.
 - <https://www.bristol.gov.uk/files/documents/2671-hmo-spd-adopted-final/file>
6. **Buckinghamshire Council (Draft Local Plan)**
 - Draft text references thresholds including 10% within 50 m radius (comparative evidence).
 - <https://buckinghamshire.oc2.uk/document/101/2091>
7. **Cheshire East Council**
 - 10% proportion within 50 m for HMOs.
 - <https://moderngov.cheshireeast.gov.uk/documents/s88488/Appendix%20%20Houses%20in%20Multiple%20Occupation%20SPD.pdf>
8. **County Durham**
 - 10% within an area test in HMO policy.
 - <https://www.durham.gov.uk/media/34069/County-Durham-Plan-adopted-2020-/pdf/CountyDurhamPlanAdopted2020vDec2020.pdf>
9. **Coventry City Council**
 - Main modifications include 10% policy wording.
 - <https://edemocracy.coventry.gov.uk/documents/s60145/Appendix%20%20Main%20Mords%20schedule.pdf>
10. **Derby City Council**
 - More than 10% of HMOs within 50 m will normally lead to refusal.
 - <https://www.derby.gov.uk/environment-and-planning/planning/development-control/hmo-planning-requirements/>
11. **Hastings Borough Council**
 - 10% within 100 m radius (Policy H4).
 - <https://www.planvu.co.uk/hbc/written/cpt8.htm>
12. **Highland Council**
 - 10% threshold in HMO guidance.
 - https://www.highland.gov.uk/download/downloads/id/15454/guidance_-_relevant_guidelines_of_objections_-_march_2014.pdf
13. **Lancaster City Council**
 - Article 4 / HMO SPD documents reference a 10% trigger.
 - <https://committeeadmin.lancaster.gov.uk/documents/s77941/Enc.%201%20for%20Direction%20under%20Article%204%20of%20the%20Town%20and%20Country%20Planning%20General%20Permitted%20Development.pdf>
14. **Lewes & Eastbourne Councils (Joint SPD)**
 - 10% threshold in SPD.
 - <https://planningpolicyconsult.lewes-eastbourne.gov.uk/HMO/viewCompoundDoc?docid=15062356&partid=15063796>
15. **Lewisham Borough Council**
 - 10% limit referenced in evidence paper.
 - <https://lewisham.gov.uk/-/media/hmo-review-and-evidence-paper-may-2022.pdf>

16. **Manchester City Council**
 - 10% threshold in SPD.
 - https://www.manchester.gov.uk/egov_downloads/8_HMOs.pdf
17. **North Kesteven District Council**
 - 10% threshold for neighbourhood concentration.
 - https://www.n-kesteven.gov.uk/sites/default/files/2023-03/HOU013%2028.10.2019_HMO_SPD.pdf
18. **Portsmouth City Council**
 - 10% radius threshold.
 - <https://www.portsmouth.gov.uk/wp-content/uploads/2022/02/Houses-in-multiple-occupation-HMO-spd-Accessible.pdf>
19. **Rhondda Cynon Taf County Borough Council**
 - 10% concentration threshold outside higher-density zones.
 - <https://www.rctcbc.gov.uk/EN/Resident/PlanningandBuildingControl/LocalDevelopmentPlans/RelateddocumentsSupplimentaryplanningGuidanc/HMOSPGFinalDocumentEnglishMay2018.pdf>
20. **Salford City Council (Draft SPD)**
 - Proposed rule: no more than 10% of homes within 100 m radius.
 - <https://www.salfordnow.co.uk/2024/02/20/salford-council-plans-to-limit-concentration-of-student-housing>
21. **Sandwell Metropolitan Borough Council**
 - 10% within 100 m radius (Reg 19 Local Plan).
 - <https://sandwell.oc2.uk/document/12/1712>
22. **Sandwell Metropolitan Borough Council [DUPLICATE]**
 - Same policy and threshold restated.
 - <https://sandwell.oc2.uk/document/12/1712>
23. **South Gloucestershire Council (Draft SPD)**
 - Technical appendix confirms intention to use a 10% threshold.
 - <https://consultations.southglos.gov.uk/gf2.ti/f/1281634/100793829.1/PDF/-/2021.05.10%20Appendix%20B%20SPD%20Case%20Studies%20ISSUE.pdf>
24. **Southampton City Council**
 - 10% threshold within 40 m radius.
 - <https://www.southampton.gov.uk/planning/planning-policy/supplementary-planning/planning-hmo/>
25. **Spelthorne Borough Council (Draft SPD)**
 - 10% within 100 m radius.
 - <https://democracy.spelthorne.gov.uk/documents/s75982/Draft%20HMO%20SPD%20ES%20Version.pdf>
26. **St Helens Council (Draft SPD)**
 - 10% within 50 m radius.
 - https://sthelens.gov.uk/media/12662/Draft-Houses-in-Multiple-Occupation-HMO-s-SPD/pdf/Houses_in_Multiple_Occupation_HMOs_SPD.pdf
27. **Wigan Council**
 - 10% within 50 m rule.

<https://www.wigan.gov.uk/Docs/PDF/Resident/Planning-and-Building-Control/Planning-guidance/HMO-SPD.pdf>

28. Wrexham County Borough Council

– 10% within 50 m radius.

<https://www.wrexham.gov.uk/sites/default/files/2023-04/lpg-5e.pdf>

29. York City Council

– Street-level 10% threshold (with separate 20% neighbourhood test).

<https://democracy.york.gov.uk/documents/s165319/71%20Cromer%20Street%20220451FUL%20Report.html>

In practice, these councils apply a clear rule: where 10% or more of dwellings within a defined radius (typically 50–100 metres) are already in use as Class C4, mixed C3/C4, or sui generis HMOs, further HMO applications are normally refused.

In many cases the 10% threshold is used in conjunction with other tests mentioned in the draft local plan (e.g. sandwiching, 3 adjacent HMOs), but the core concentration test itself is a consistent feature across these councils.

Some authorities apply thresholds at different radius distances (e.g. 40m, 50m, 100m) depending on local supplementary planning document (SPD) definitions.

For example, Bristol Council has explicit guidance about this which identifies situations where harmful HMO concentrations are likely to arise.

See

https://assets.publishing.service.gov.uk/media/6835c438214f7f554cf69318/HMO_SPD_checked.pdf.

It states on page 1: “These include the sandwiching of residential properties by HMOs and areas where more than 10% of dwellings are occupied as HMOs.”

Durham, a comparable university town which has colleges like Cambridge, has a 10% threshold in place and is considering a county-wide Article 4 Direction:

<https://www.bbc.co.uk/news/articles/ckqyk0jl7n9o#:~:text=Durham%20County%20Council%20is%20considering%20an%20Article.better%20distribution%20of%20mixed%20and%20balanced%20communities>

York states “Whilst there is no formal definition of what constitutes a balanced community, recently, for York, through consultation, a threshold of 10% of all properties being HMOs within 100m and 20% across a neighbourhood area have been established as the point at which a community can tip from balanced to unbalanced.”

<https://www.york.gov.uk/downloads/file/2868/houses-in-multiple-occupation-faqs-june-2018->

Cambridge's draft local plan merely says that proposals for HMOs that require planning permission (C4 or sui generis) will be supported, where:

a. "the proposed HMO does not create an over-concentration of such a use in the local area or cause harm to residential amenity or the surrounding area"

This wording is materially no different from the existing Local Plan and fails to provide a usable policy test. It does not go far enough.

While we welcome the restrictions on sandwiching HMOs and preventing three adjacent properties becoming HMOs, a vague reference to "an over-concentration" is not working for Cambridge. Without a defined numerical threshold, the concept of "over-concentration" remains subjective and elusive, making it significantly more difficult for planners to refuse applications or defend refusals at appeal.

A clear definition — such as a 10% threshold within a defined radius — would reduce speculative applications, saving the council time, cost and officer resource. It would also make it harder for applicants to appeal against decisions which are, at the moment, subjective and challengeable.

I strongly believe Cambridge needs a clear stated threshold of 10% due to the fact that:

a) there are already thousands of HMOs in our city because no threshold currently exists

b) in many places, the 10% threshold has already been breached, and that is already causing problems in neighbourhoods like Petersfield (see detailed comments below from our survey of GRARA members).

A 10% threshold is recommended, follows the example of other councils and would preserve and protect the areas in Cambridge where this threshold has not already been breached, preventing further erosion of family housing in these neighbourhoods.

However, any kind of threshold, particularly in Petersfield, would be better than none. Oxford City Council has a 20% HMO within 100m threshold policy in its Local Plan dated June 2020, see page 43, policy 'H6':

<https://www.oxford.gov.uk/downloads/file/1637/adopted-oxford-local-plan-2036>

It should be noted that this threshold may be higher than other councils because an [Article 4 Direction](#) came into force on 25 February 2012 that introduced local planning controls for HMOs in the whole Oxford City Council area. Bear in mind that the changes to the planning system that extended permitted development rights to allow a change of use from a dwelling house (Use Class 3) to a small HMO (Use Class 4) without the need for planning permission occurred in 2010.

Evidence of other Article 4 directions preventing

Article 4 Directions remove permitted development rights to change a dwellinghouse (Use Class C3) into a small HMO (Use Class C4), meaning planning permission is required for that change of use. They don't prohibit HMOs, but require them to be assessed through the planning process to manage concentrations and neighbourhood impacts. They would be very helpful in Cambridge to support the other measures proposed in the Local Plan to ensure that there is not a harmful "over-concentration" of HMOs.

Below is a list of 51 councils which have Article 4 directions, to give you a sense of just how many councils across England utilise this important planning measure. Please note that my comment continues after the list.

Article 4 Directions for HMOs (Permitted Development Rights Removed)

Planning permission required to change Use Class C3 dwellinghouses to small HMOs (Use Class C4).

1. **Ashford Borough Council**

<https://www.ashford.gov.uk/planning-and-building-control/planning-policy/article-4-directions/>

"The Article 4 Direction removes permitted development rights, meaning planning permission is required for changes of use to houses in multiple occupation."

2. **Basildon Borough Council**

<https://www.basildon.gov.uk/article-4-directions>

"Immediate Article 4 Directions apply in specific wards to manage the concentration of houses in multiple occupation."

3. **Basingstoke and Deane Borough Council**

<https://www.basingstoke.gov.uk/article-4-directions>

"The Article 4 Direction removes permitted development rights for changes from dwellinghouses to houses in multiple occupation."

4. **Barnet London Borough Council**

<https://www.barnet.gov.uk/planning-and-building-control/planning-policies-and-local-plan/small-houses-multiple-occupation-hmo>

“Planning permission is required for the change of use of a dwellinghouse to a small HMO within the Article 4 area.”

5. **Barnsley Metropolitan Borough Council**

<https://www.barnsley.gov.uk/services/planning-and-building-control/planning-policy/article-4-directions/>

“The Article 4 Direction restricts the change of use from Class C3 to Class C4 in designated areas.”

6. **Bedford Borough Council**

<https://www.bedford.gov.uk/planning-and-building-control/planning-policy/hmo-article-4-direction>

“An Article 4 Direction is in force requiring planning permission for changes to houses in multiple occupation.”

7. **Bexley London Borough Council**

<https://www.bexley.gov.uk/services/planning-and-building-control/planning-policy/article-4-directions>

“The Article 4 Direction removes permitted development rights for HMO conversions.”

8. **Birmingham City Council**

https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/95/article_4_directions

“This Article 4 Direction means planning permission is required to change a dwellinghouse into a house in multiple occupation.”

9. **Bolton Council**

<https://www.bolton.gov.uk/planning-policy/article-4-directions>

“The council has proposed an Article 4 Direction to remove permitted development rights for HMOs.”

10. Brighton & Hove City Council

<https://www.brighton-hove.gov.uk/planning/planning-policy/article-4-directions>

“Article 4 Directions apply in parts of the city to manage the impact of HMOs.”

11. Burnley Borough Council

<https://www.burnley.gov.uk/residents/planning-and-building-control/planning-policy>

“A draft Article 4 Direction has been approved to control the spread of houses in multiple occupation.”

12. Cheshire East Council (Crewe)

<https://www.cheshireeast.gov.uk/planning/spatial-planning/article-4-directions.aspx>

“Article 4 Directions remove permitted development rights for changes to HMOs on specified streets.”

13. Crawley Borough Council

<https://www.crawley.gov.uk/planning/planning-applications/you-apply/article-4-directions>

“Planning permission is required for the creation of HMOs within Article 4 areas.”

14. Doncaster Council

<https://www.doncaster.gov.uk/services/planning/houses-in-multiple-occupation-article-4-direction>

“The Article 4 Direction removes permitted development rights for HMOs in defined areas.”

15. Ealing London Borough Council

https://www.ealing.gov.uk/info/201155/planning_and_building_control/3423/article_4_directions_immediate_and_non-immediate_to_remove_hmo_permitted_development_rights

“Immediate and non-immediate Article 4 Directions remove permitted development rights for HMOs.”

16. Enfield London Borough Council

<https://www.enfield.gov.uk/services/planning/planning-policy/article-4-directions>

“The Article 4 Direction requires planning permission for changes of use to HMOs.”

17. Fenland District Council (Wisbech)

<https://www.fenland.gov.uk/article4>

“Article 4 Directions apply in Wisbech wards to control the development of HMOs.”

18. Greenwich London Borough Council

https://www.royalgreenwich.gov.uk/info/200260/planning_policy/1506/article_4_directions

“The borough-wide Article 4 Direction removes permitted development rights for HMOs.”

19. Hackney London Borough Council

<https://hackney.gov.uk/article-4-directions/>

“Planning permission is required for the change of use to a house in multiple occupation.”

20. Haringey London Borough Council

<https://www.haringey.gov.uk/planning-building-control/planning/planning-policy/article-4-directions/article-4-direction-houses-multiple-occupation>

“An Article 4 Direction has been in place since 2013 controlling small HMOs.”

21. Havering London Borough Council

<https://www.havering.gov.uk/planning-3/article-4-directions/2>

“Two Article 4 Directions remove permitted development rights for HMOs in specified areas.”

22. Hillingdon London Borough Council

<https://www.hillingdon.gov.uk/article-4-directions>

“Article 4 Directions restrict the creation of houses in multiple occupation.”

23. Hounslow London Borough Council

https://www.hounslow.gov.uk/info/20028/planning_policy/1527/article_4_directions

“Planning permission is required for HMO conversions under the Article 4 Direction.”

24. Hyndburn Borough Council

<https://www.hyndburnbc.gov.uk/planning-policy>

“Public consultation has taken place on an Article 4 Direction to restrict HMOs across nine wards.”

25. Lambeth Council

<https://www.lambeth.gov.uk/planning-building-control/planning-policy/article-4-directions>

“A non-immediate Article 4 Direction has been consulted on for Streatham wards.”

26. Leeds City Council

<https://www.leeds.gov.uk/planning/planning-policy/supplementary-planning-documents-and-guidance/houses-in-multiple-occupation-article-4-direction>

“Planning permission is required to change a dwellinghouse to a house in multiple occupation.”

27. Leicester City Council

<https://www.leicester.gov.uk/planning-and-building/planning-applications/do-i-need-permission/article-4-directions/>

“The Article 4 Direction removes permitted development rights for HMOs.”

28. Lewisham London Borough Council

<https://lewisham.gov.uk/myserVICES/housing/private-tenants-and-landlords/landlords/hmo/article-4-direction-on-small-hmos>

“Two Article 4 Directions remove permitted development rights for small HMOs.”

29. Liverpool City Council

<https://liverpool.gov.uk/planning-and-building-control/planning-permission/planning-permission-for-hmos/>

“Planning permission is required for HMOs within Article 4 areas.”

30. Manchester City Council

https://www.manchester.gov.uk/info/500207/planning_and_regeneration/1962/additional_planning_guidance/7

“An Article 4 Direction covers HMOs across the city.”

31. Nottingham City Council

<https://www.nottinghamcity.gov.uk/planningpolicy>

“The Article 4 Direction restricts permitted development rights for HMOs across much of the city.”

32. Old Oak and Park Royal Development Corporation (Central London)

<https://www.london.gov.uk/who-we-are/city-halls-partners/old-oak-and-park-royal-development-corporation-opdc/planning/opdc-planning-applications/article-4-directions>

“Article 4 Directions remove permitted development rights for HMOs within the OPDC area.”

33. Oxford City Council

<https://www.oxford.gov.uk/planning-policy/planning-control-houses-multiple-occupation>

“An Article 4 Direction came into force on 25 February 2012...planning permission is required to change the use of a C3 dwelling house to a shared rented house (C4 HMO).”

34. Preston City Council

<https://www.preston.gov.uk/article/10115/Article-4-Directions>

“Article 4 Directions apply to control the spread of houses in multiple occupation.”

35. Sefton Council

<https://www.sefton.gov.uk/planning-building-control/planning-policy/article-4-directions.aspx>

“Article 4 Directions apply in Bootle, Litherland, Seaforth, Waterloo, Southport and borough-wide.”

36. Southampton City Council

<https://www.southampton.gov.uk/planning/planning-permission/apply-planning-permission/apply-hmo/>

“Planning permission is required for HMOs within Article 4 areas.”

37. Stevenage Borough Council

<https://www.stevenage.gov.uk/planning-and-building-control/planning-policy/article-4-directions>

“The Article 4 Direction removes permitted development rights for HMO conversions.”

38. Sutton London Borough Council

<https://www.sutton.gov.uk/w/article-4-directions>

“A non-immediate Article 4 Direction applies borough-wide for HMO conversions.”

39. Tower Hamlets London Borough Council

https://www.towerhamlets.gov.uk/lgnl/planning_and_building_control/planning_policy_guidance/Article_4_Directions.aspx

“The Article 4 Direction removes permitted development rights for HMOs.”

40. Trafford Borough Council

<https://www.trafford.gov.uk/planning/planning-policy/article-4-directions.aspx>

“Article 4 Directions apply in parts of the borough to control HMOs.”

41. Wakefield Council

<https://www.wakefield.gov.uk/planning/planning-applications-and-advice/help-with-a-planning-application/article-4-direction-for-smaller-houses-in-multiple-occupation>

“The Article 4 Direction applies to smaller houses in multiple occupation.”

42. Walsall Council

<https://go.walsall.gov.uk/planning-and-building-control/planning-policy/houses-multiple-occupation-hmo-consultation-article-4>

“A borough-wide Article 4 Direction removes permitted development rights for HMOs.”

43. Waltham Forest London Borough Council

<https://www.walthamforest.gov.uk/planning/planning-policy/article-4-directions>

“Article 4 Directions restrict permitted development rights for HMO conversions.”

44. Warwick District Council

https://www.warwickdc.gov.uk/info/20794/supplementary_planning_documents_and_other_guidance/272/hmo_article_4_direction/2

“The Article 4 Direction requires planning permission for HMOs in designated areas.”

45. Wigan Council

<https://www.wigan.gov.uk/Council/Strategies-Plans-and-Policies/Planning/Article-4-direction.aspx>

“A borough-wide Article 4 Direction removes permitted development rights for changes to HMOs.”

46. Worcester City Council

<https://www.worcester.gov.uk/planning/planning-policy/article-4-directions>

“Article 4 Directions restrict permitted development rights for HMOs.”

47. City of York Council

<https://www.york.gov.uk/private-landlords-tenants/article-4-direction-relation-houses-multiple-occupation-hmo>

“The Article 4 Direction requires planning permission for changes of use to HMOs in York.”

48. Camden London Borough Council

<https://www.camden.gov.uk/planning/article-4-directions>

“Article 4 Directions apply borough-wide to control changes of use to houses in multiple occupation.”

49. Islington London Borough Council

<https://www.islington.gov.uk/planning/permitted-development/article-4-directions>

“Article 4 Directions remove permitted development rights for HMO conversions.”

50. Southwark London Borough Council

<https://www.southwark.gov.uk/planning/article-4-directions>

“Certain Article 4 Directions have been made for HMOs in priority neighbourhoods.”

51. Lewes District Council *(not previously listed)*

<https://www.lewes-eastbourne.gov.uk/planning-policy/article-4-directions/>

“Article 4 Direction in place to help manage concentrations of HMOs.”

I could go on. There are so many.... it's crazy that Cambridge, which has two thriving universities that feed into a hugely expensive rental property market for local residents, does not have any regulations or restrictions about this.

Why we need an Article 4 direction for Petersfield

Regarding Article 4 direction for Petersfield specifically, here are the numbers of HMOs already in our small neighbourhood:

There are 25 houses on Guest Road and two are licensed HMOs: 7 Guest Road and 19 Guest Road.

There are 13 houses on Mackenzie Road and of these, at least one is a licensed HMO (23 Mackenzie Road). 11 Mackenzie also appears to be an HMO, rented out to Hughes Hall college students.

There are 20 houses on Willis Road and at least two are licensed HMOs (one existing licensed HMO at 1a Willis Road and another in the process of being licensed, 23 Willis Road). 5 Willis Rd is also a well-run house of multiple occupation owned by Christ's College, and is listed in this legislation: https://www.legislation.gov.uk/ukxi/2006/647/pdfs/ukxiem_20060647_en.pdf
In recent years, it appears at least two other properties on the road have begun operating as unlicensed HMOs.

On Collier Road, there are 20 houses and 17 of these properties (1, 3, 5, 7, 9, 11, 13, 17, 19, 21, 23, 27, 29, 31, 33, 37, 39), are registered with The Student Accommodation Code, now called the UUK/GuildHE Accommodation Code of Practice (an alternative to local HMO licensing, specifically for universities) by Anglia Ruskin University. See: <https://accommodationcode.ac.uk/about-us/> and <https://accommodationcode.ac.uk/coverage?u=2&s=25&b=93>.

In the vicinity of our neighbourhood, there are numerous registered HMOs on the odd-numbered side of Mill Road (such as 3, 5, 11, 17, 19, 21, 23, 31, 33 and 35 Mill Road - this may not be a comprehensive list). Bedrooms in 7 and 9 Mill Road are bookable online as Airbnb/style accommodation.

Overall, there are 97 houses across these roads, of which at least 32 are registered HMOs, meaning a minimum of 33% of properties are HMOs — this figure does not include the suspected unlicensed HMOs and the college HMOs which do not need to be registered HMOs.

The overwhelming majority of our residents believe that we have enough HMOs in our neighbourhood now (see survey results below).

It is important to note that the character of our neighbourhood is being gradually eroded by HMOs, and a community of family homes which has existed for over a century is under threat. Despite their close proximity to the large scale HMOs and problematic Airbnb bedsits on Mill Road and the well-managed student accommodation on Collier Road, the majority of houses on Guest, Willis and Mackenzie roads are longstanding family homes and the character and community of these roads have long reflected that.

If any further family homes in our neighbourhood are allowed to become HMOs, even small HMOs, it will lead to an over-concentration of HMOs in the area, pushing out families who need local homes, increasing house prices, changing the character of these roads and harming the residential amenity of this longstanding local community. If properties are allowed to become Airbnbs or short-term lets, the same consequences will apply.

Yet planners and councillors have been helpless to stop investors buying up family homes, adding extensions/doing loft conversions and then turning them into so-called 'small' HMOs for up to six people, which falls under the property's permitted development rights. This has happened repeatedly in our neighbourhood over the past five years. The bedrooms in these houses are reduced to tiny proportions to fit in more students and the kitchens do not have enough space for them all to cook and dine in, and there is usually no other communal living space, because these homes were not built to accommodate six unrelated people. Yet these HMOs are not subject to any regulation or licensing, and the council is powerless to prevent these homes being converted at a time when many families struggle to afford to live in Cambridge, putting further pressure on the housing market.

Airbnbs/bedsits and HMOs in central Cambridge - and particularly in Petersfield - are known to increase noise, anti-social behaviour, traffic and nuisances such as large numbers of takeaway delivery drivers during the evening (due to the lack of cooking facilities/no desire to cook in a crowded, noisy shared house) and resulting litter/vermin. Previously there have been problems with overflowing bins related to these properties in Petersfield, as Adam Drewry, Commercial Waste Account Manager at Greater Cambridgeshire shared waste can attest.

Recently, a HMO flytipped six mattresses into the front garden of another HMO on Willis Road. The resident students were upset because the unsightly, dirty, stinking mattresses were outside their bedroom windows on the ground floor, but they were unable to get either landlord to intervene - both landlords ignored their pleas to remove the mattresses and the students approached GRARA because they didn't want to flytip them onto the street or get into an argument with the landlords. It took numerous emails from neighbouring residents and an intervention and warning from GRARA to the landlords to get the mattresses removed and disposed of.

We also have had problems due to lack of bicycle storage for all the many occupants of HMOs on our roads, leading HMO residents to store their bicycles against lampposts on pavements, causing problems for disabled wheelchair users and pram users and encouraging bicycle thieves and burglars to visit the area and steal the bikes.

Similarly, there is lack of parking, creating parking problems for a residential parking scheme which is vastly oversubscribed. The Guest Zone in Petersfield is well-known to the highways department as a residents' parking zone which is under extreme pressure, with just 58 spaces provided for more than 100 properties, some of them HMOs.

Each HMO resident can apply for 20 residents visitors permits each year, even if they are not allowed to get annual residents permits, and each of those 20 permits gives the user 5 spaces (i.e. 100 spaces each year).

Shockingly, this means each HMO resident can access up to 100 all-day parking spaces per year. In a six-bedroom 'small' HMO, which required no planning permission for a conversion, this equates to 600 visitor parking spaces annually for one former family home, in addition to up to three annual residents' permits — placing severe pressure on an already oversubscribed parking scheme.

Partly as a result of these pressures, residents are often unable to find anywhere to park in the zone. Adding more HMOs with insufficient cycle parking and the ability to get residents' and visitors parking permits would add to the parking and traffic problems for residents, causing huge amounts of stress for existing residents.

We desperately need an article 4 direction for Petersfield. The draft local plan lists many good reasons why planning permission for a HMO will be turned down by the council, such as:

- being 'sandwiched' between two HMOs or result in three or more adjacent properties as HMOs;
- the building or site (including any outbuildings) being unsuitable for use as a HMO, as there is not enough provision made for appropriate refuse and recycling storage, cycle and car parking, and drying areas
- the HMO has does not have access to sustainable modes of transport, shops and other local services
- There is no appropriate management arrangement in place to monitor and minimise antisocial behaviour and adverse impact on local residents.

However, where an HMO accommodates fewer than seven people, no planning application is required, meaning all of these policy safeguards are bypassed, even where impacts on amenity and infrastructure are severe.

There is currently no mechanism to prevent or monitor 'sandwiching' or the creation of three adjacent HMOs where one or more of the properties is a small HMO accommodating six people rather than seven.

This creates a clear policy loophole, as the harmful impacts of sandwiching and cumulative HMO concentration still occur regardless of occupancy numbers. This is already happening in our neighbourhood, in Willis Road and Guest Road.

That's why we need an article 4 direction, so that these important safeguards in the local plan can be brought into play and prevent more problems in our neighbourhood.

In 2012, Cambridge council wrote "There is currently no evidence to suggest that Cambridge, or any areas within the City, have particularly high concentrations of HMOs or issues arising from them which would warrant this course of action."

Since then, substantial new evidence has emerged, demonstrating very high numbers of both licensed and unlicensed HMOs across Cambridge. It appears there are over 4,353 HMOs on the licence register (according to the results of this website

https://pp.3csharedservices.org/registers/index.html?fa=licence_register&council_id=1) and there will be hundreds, if not thousands more, that are unlicensed because they are 'small HMOs'.

Others will be unregistered because they are managed by universities/colleges and higher education institutions aren't subject to the same HMO licensing requirements as other landlords, as in the case of 5 Willis Road and the properties on Collier Road. The fact is, Cambridge is overrun with HMOs.

The evidence threshold cited in 2012 has now clearly been met and exceeded. There is demonstrable evidence of both high concentrations of HMOs and associated harms. We therefore urge the Council to act. Specifically, we ask that Petersfield be granted an Article 4 Direction and that the Local Plan adopt a clear 10% HMO concentration threshold.

In support of this request, we ask you to take into consideration the following evidence of community engagement in these issues.

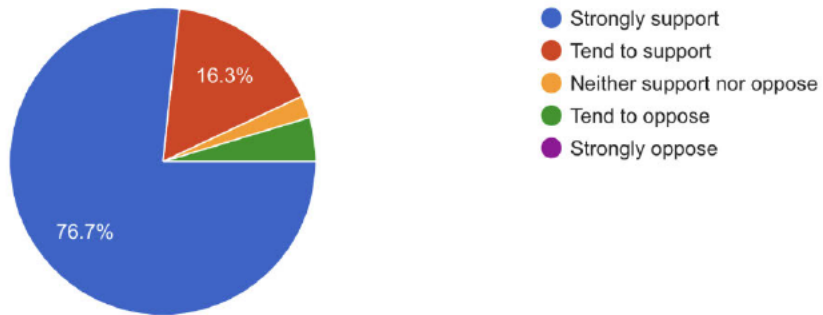
in January 2026, GRARA surveyed its members (the residents of Willis Road, Guest Road, Mackenzie Road, Collier Road and the odd numbered houses from 3 to 39 Mill Road) to get their views on HMOs.

In total, 43 residents participated. The survey revealed there is overwhelming support in our neighbourhood for both a 10% threshold and an article 4 direction.

Here are the results of our survey:

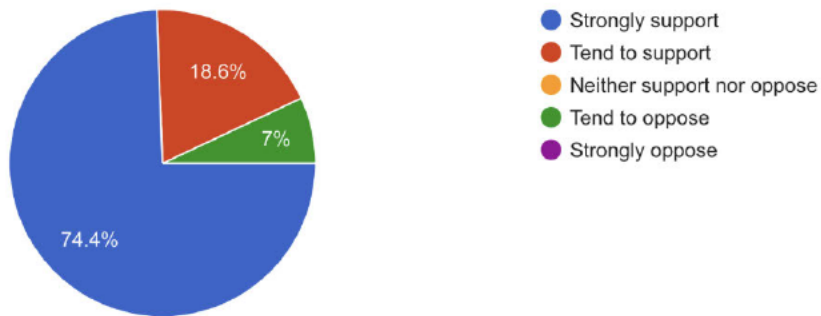
Do you support Cambridge City Council defining "over-concentration" of Houses in Multiple Occupation (HMOs) using a clear numerical threshold in the Local Plan (for example, a percentage of homes within a short distance)?

43 responses



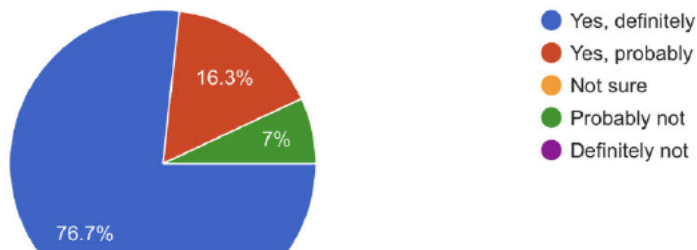
Many UK councils, including Durham, Bristol, Brighton & Hove and Bath, use a 10% threshold for HMOs in local areas. To what extent do you support Cambridge adopting a similar 10% threshold?

43 responses



In your view, would a defined HMO threshold help protect the character, balance and residential amenity of established neighbourhoods in Cambridge?

43 responses



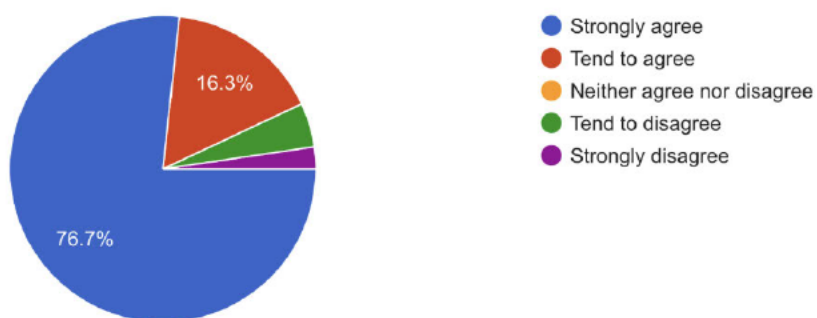
Do you support the introduction of an Article 4 Direction to manage further HMO and short-term let conversions in central Cambridge areas where HMO concentrations are already high?

43 responses



Specifically for Petersfield, do you agree that an Article 4 Direction is needed to prevent further loss of family housing and protect the existing residential community?

43 responses



We also asked residents to briefly explain or describe how HMOs or short-term lets have affected them and our neighbourhood and 23 residents engaged with this question. Their responses have been anonymised. Here are their views:

1. "Within this area, there is a very high concentration of HMO's. This puts an intolerable burden on local services such as waste collection, litter, parking. Family housing is being lost and the character of the area is changing away from being a predominantly family area to an area of transient people dominating the local area. This strains the local facilities such as medical provision for GP surgeries, et cetera. There is increased strain of refuse and street cleaning. Within this area there was a very high concentration of HMOs already way in excess of the amount permitted by many other local authorities. In this respect Cambridge needs to up its game otherwise the character of local areas will be permanently lost. In this area in particular there's an over concentration of HMOs. This is a conservation area and over population with HMO's puts conservation at risk."

2. "There is already a shortage of residents' parking in our area but this becomes far worse with HMOs. They can buy large quantities of visitors' parking permits which just exacerbates the problem. We've had many issues with litter and bins as a result of all the HMOs near our house. The HMOs have been known to divide their rubbish up between all the neighbours bins, to allow overflowing rubbish from their own bins to pile up and most recently a stack of around 6 old mattresses were left in full public view. It has taken a month (and lots of emails) to get them all disposed of."
3. "We have up to 9 students living next door. Lots of coming and going, slamming doors late at night, we can hear conversations (often late at night) as the party wall has poor sound insulation. Sound carries from their back kitchen to the bedroom above, often disturbing my elderly mother. We can also hear conversations at the front of the house. Privacy issue here as they can most probably hear ours. On several occasions, normally past 11pm, we have needed to ask them to be quieter. The landlord has been made aware of the problem."
4. "I think Cambridge could benefit from higher-density housing, and I don't want to prevent that: students and single adults need affordable places to live, too, and I'm not sure central Cambridge should be mostly single-family homes. But it would be great to see a limit on Airbnbs or other short-term lets with leases less than a year because people staying in such places are here for only a very short amount of time (maybe just days) and tend to not contribute as much if at all to the local community."
5. "HMO's unfortunately tend to lead to an increase in problems with rubbish, noise and parking, all of which are upsetting in a mainly residential area. Also unfortunately HMO tenants do not join in community activities, either those designed to improve the environment (eg litter picking) or purely social ones (eg street party) which do so much to ensure community cohesion. They do change the area, and not for the better."
6. "I'm in favour of dense housing, but landlords who run HMOs are often very irresponsible and don't keep their tenants well-informed. It makes it difficult to tackle local issues in the neighborhood. In addition, short-term lettings like Airbnb properties leave a lot of rubbish. I'd be more in favour of purpose built housing rather than converting existing family housing into expensive HMOs."
7. "HMO's have their place and serve a useful purpose. However, as everyone knows, once their concentration in an area exceeds a certain threshold they erode the character of the neighbourhood. This is bad for everyone, even for HMO residents and existing HMO owners. The common good requires regulation."
8. "HMOs tend to not contribute to the neighborhood, because of constant change in occupancy. This has led to neglect. For example, garbage bins are not collected and are cluttering the sidewalks. Back alley gates are not properly closed, attracting thieves to the neighborhood. There is little participation in Grara."
9. "HMOs bring more litter including things like mattresses that don't get removed. They also overwhelm parking in already challenging parking environment. There is constantly lots of noise from building works. The area needs more family homes. There aren't enough in Cambridge. We don't need more HMOS."
10. "HMOs have detrimental impacts on both the physical quality of the neighbourhood (e.g. more bins, frequently not well managed and often overfilled) as well as diminishing the

sense of community that comes from having a preponderance of long term family residences.”

11. “I hope we can retain the current residential character of our neighbourhood of individuals and families (owners and renters). We have enough parking and bin problems without squeezing more people into the limited space.”
12. “We already experience significant negative impact of increasing HMOs in: parking availability for residents, refuse (numerous problems including overflowing bins, dumping of refuse), noise levels, and security concerns.”
13. “The area is “highly desirable “ for companies that run HMO businesses. We are in real danger of too many of these, and we need to manage this carefully. Local residents should have a voice through the planning process.”
14. “There seems to be no control (including in Article 4 directions) to control short term lets (airbnbs). In my opinion these are even more detrimental to the local area than HMOs.”
15. “I think HMOs add to the character of the area. We are a busy, urban area, and I enjoy the vibrancy that small HMO housing brings to the neighbourhood.”
16. “We have a lovely family based community. Too many HMOs are changing the feel of the neighbourhood. There is not enough parking to support it.”
17. “The main problem in the area is AirBNBs (short lets). We are concerned that they are not covered by HMO regulations.”
18. “Less sense of community, knocking on doors for package delivery, deliveroo drivers, problems with rubbish and noise.”
19. “There remains an on-going problem with waste disposal from HMOs and very high frequencies of deliveries traffic.”
20. “HMOs can contribute to a more diverse and vibrant community in our area.”
21. “Noise, anti-social behaviour, inappropriate bin use, parking issues.”
22. “I’m dead against HMOs and strongly oppose them.”
23. “Litter, bins, fly tipping, parking.”

Thank you for your time reading this. GRARA would welcome discussions and further engagement with the council on this important issue.