

Annex C:

Consultation response: Objection to revocation of HMO parking permit.

I refer to your consultation letter concerning the revocation of the House of Multiple Occupation permit, dated 23rd May 2025. I object to the revocation of this permit. It appears to be an iniquitous and arbitrary proposal, at odds with the commitment to equality and affordability in the Council Plan. I have lived at the same HMO in Wenlock Terrace for in excess of 20 years.

HMOs fall under Class C4 of the Town and Country Planning (Use Classes)(Amendment)(England) Order 2010. The definition of an HMO here is the same as Section 254 of the Housing Act 2004 which at para. (2)(b) states that a building meets the standard test if the living accommodation is occupied by persons who do not form a single household.

Therefore by the statutory definition of an HMO, the residents are effectively individual households. Each household is effectively the same as a household in a flat or flatted development, or in a single domestic house.

Charging escalating rates for successive permits to individuals living at an HMO unfairly and arbitrarily penalises the individual household for car ownership by another household. This is manifestly unfair to the point of being iniquitous. It is also at odds with the treatment of residents of non-HMOs who are able to buy a household permit at the same flat rate, irrespective of how many other households have purchased parking permits in their street or RESPARK zone. As the Executive Member Decision Report, 12th November 2014 notes at page 14, residents of HMOs are low income groups, this appears discriminatory on socio-economic grounds.

Again at page 14 it is suggested that the impact on lower socio-economic groups is neutral, as the first permit will be a lower cost which will balance the higher cost of the two further permits. However, this is flawed, as the impact on the first individual household may be beneficial, but on the other two households, it would be negative. Even if you could trade the equalities of one individual for those of another, the two households being charged a substantially higher fee for their household permits outweighs the savings by the first.

It is stated at paragraph 10 that due to reasons set out there and elsewhere in the report, a potential increase in the number of HMO permits will result in increased demand on already overstretched capacity for parking. However, while I am aware of extreme parking pressure in some wards and individual streets, evidence is not presented in the report to demonstrate this is the case across the City. I can only speak for my observations of parking in Wenlock Terrace, but I have noted that since the introduction and enforcement of the RESPARK scheme, much of the street is often near empty, morning noon and night. It is not clear that the assumptions made in the report are evidenced by actual measurement of capacity. It

should also be noted that whilst specific numbers of HMO parking spaces are referenced, in streets such as Wenlock Terrace, no parking bays or HMO parking bays are set out, consequently it is unclear how demand for them could be exceeded.

In addition, the suggestion that HMO residents could just find themselves somewhere else to park would put further pressure on nearby non-RESPARK areas.

For the reasons set out above, I object to the revocation of the HMO parking permit, and the proposed escalation of fees for applications for additional permits by unrelated households.