

**Report of the Director of City Development**

**Report to: Development Plan Panel**

**Date: 2<sup>nd</sup> JULY 2012**

**LDF Core Strategy – Publication Draft, Analysis of Consultation Responses:  
Policy H6 - Houses in Multiple Occupation (HMOs), Student Accommodation and  
Flat Conversions**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input type="checkbox"/> No

**Summary of main issues**

1. The Core Strategy Publication Draft was subject to 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
2. Of the wide range of issues raised, none are considered to warrant any major changes to the Core Strategy and only one or two minor text changes are considered necessary which are set out in Appendices 1 and 2.

**Recommendations**

Development Plan Panel is requested to:

- i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

## **1.0 Purpose of this Report**

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6<sup>th</sup> June), the purpose of this report is to review consultation responses in relation to Policy H6 - Houses in Multiple Occupation (HMOs), Student Accommodation and Flat Conversions. Appendix 1 attached, summarises the representations, key issues raised, the City Council's view and proposed action.

## **2.0 Background Information**

- 2.1 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28<sup>th</sup> February to 12<sup>th</sup> April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

## **3.0 Main Issues**

- 3.1 Support for the policy

Policy H6 received 26 supportive comments, these were from individuals, resident associations and other interested bodies. Some suggested whole support for the policy, whilst others were generally supportive of the principle but had other suggestions on specific sections of the policy. These, along with the objections are summarised below.

- 3.2 Concerns with the evidence base

There is concern that the Council does not have sufficient robust evidence to justify the policy. The policy does not provide evidence on the number of HMOs, where

these are located across the city, or whether excessive concentrations of HMOs cause harm.

### 3.3 Purpose Built Student Accommodation

Differing views on whether the policy should favour purpose built student accommodation as it does now.

### 3.4 Equality

As HMOs are predominantly occupied by young people there has been concern expressed that the Equality Impact Assessment is not robust enough in dealing with this issue.

Also on equality, several respondents had views (both for and against) on whether the policy should be applied differently in certain areas of the city that already have high concentrations of HMOs.

### 3.5 Focus on 'balance and health of communities'

Some of the terms used in the document have come under criticism, as they are not defined. These include 'health' and 'wellbeing' which are both used in policy H6. The use of 'balance' has also been highlighted as it has been suggested that it is not a valid concern of planning law.

### 3.6 Impact on housing

The policy will have an impact on housing within Leeds and has been criticised for not identifying the need/demand for HMOs within the policy. Landlords are also concerned that should they invest to let to single occupants, they would then be unable to let to multiple occupants in the future should market conditions change.

### 3.7 Policy has never been subject to formal consultation

The current consultation process was undertaken to assess the soundness of the Core Strategy. On this basis it has been suggested that policy H6 has not been subjected to formal consultation, rather only as to whether it is sound.

### 3.8 Use of a Supplementary Planning Document is not suitable for further policy.

Policy H6 states that supplementary planning advice will set ceilings for the proportion of HMOs desirable in different geographies of Leeds. The suitability of this approach has been questioned.

### 3.9 Additional comments on the text.

Several other comments have been made in relation to the policy, these include suggestions to alter specific wording for clarity, but not changing the over all aim of the policy. Other objections relate to the inclusion of parking standards, a requirement for street level access and a minimum size for conversions. Further

comments relate to the monitoring of the policy and suggestions to include a proviso regarding flood risk.

#### **4.0 Corporate Considerations**

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

#### **4.1 Consultation and Engagement**

- 4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

#### **4.2 Equality and Diversity / Cohesion and Integration**

- 4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10<sup>th</sup> February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

#### **4.3 Council Policies and City Priorities**

- 4.3.1 The Core Strategy, plays a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the best city in the UK'. Related to this overarching approach and in meeting a host of social, environmental and economic objectives, where relevant the Core Strategy also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Leeds Growth Strategy, the City Priority Plan, the Council Business Plan and the desire to be a 'child friendly city'.

#### **4.4 Resources and value for money**

- 4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

#### **4.5 Legal Implications, Access to Information and Call In**

- 4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

#### **4.6 Risk Management**

- 4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

## **5. Conclusions**

- 5.1 This report provides an overview of the issues raised about Policy H6. It is not considered that any of the issues raised are compelling enough to justify any major changes to the Core Strategy; nine of the issues generate minor wording changes and all of the others warrant no further changes.

## **6. Recommendations**

- 6.1 Development Plan Panel is requested to:

i). endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

## **7. Background documents<sup>1</sup>**

- 7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

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<sup>1</sup> The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

**Appendix 1:**

**Core Strategy Publication Draft - Analysis of Consultation Responses**

**Policy H6 - Houses in Multiple Occupation (HMOs), Student Accommodation and Flat Conversions**

Representor	Representor Comments	LCC Initial Response	Action (i.e. ' <u>no change</u> ' to the Publication draft, or ' <u>Proposed Change</u> ' to the Publication draft)
<b>Concern over evidence to support policy.</b>			
Leeds HMO Lobby	Policy on HMOs could be more fully justified	<p>There has been a marked shift in UK tenure trends over the last 10 years towards the private rented sector. In Headingley for example the evidence shows at least 40% of properties are now HMOs, far exceeding the national average and this is a concern for many residents. The Council uses a mixture of evidence to support the policy, from Council Tax data (a student property is exempt for paying Council Tax) to licensing statistics. However, it is acknowledged that we do not have a complete list of HMOs, particularly those housing non students, within Leeds. There are 147,000 properties within the Article 4 Direction area, and it is not practical or possible to undertake a fully comprehensive survey.</p> <p>H6 is a general policy that relates to the Article 4 Direction area. Its aim is to avoid excessive concentrations but it does not include 'tipping points' or thresholds which are sometimes used to determine the detrimental impacts of HMO concentration. The policy should not be that prescriptive because HMO concentration can change rapidly and the policy needs to be valid</p>	No change.
Bury & Walker Solicitors <i>representing</i> Leeds Residential Property Forum	Council does not have proper information as to the supply of HMO accommodation and detailed information regarding need/demand. Also, little or no information in relation to non student occupation.		
National Landlords Association	'Tipping points' as promoted by National HMO Lobby should not be used as the basis for planning policy. Must be based on substantive, objective empirical evidence of local problems.		
Parklane Properties	What evidence is there to justify policy?		
Leeds University Union	Not based on robust and credible evidence i.e pressure on private housing reducing.		

		throughout the plan period. On this basis the evidence available is considered to justify the policy in its current form.	
Inner NW Area Committee Planning Sub Group	Should refer to evidence of problems with high concentrations of HMOs outlined in 'Evidence Gathering: Housing in Multiple Occupation and possible planning responses - Final Report (September 2008)'.	This report listed the associated problems with high concentrations of HMO which provide clarity.	PC (minor). Include list of impacts from the report in para 5.2.21
<b>Purpose built student accommodation.</b>			
Leeds HMO Lobby	CS talks about meeting housing need. Purpose built accommodation should be encouraged to release private HMOs for family housing.	Policy broadly supports new purpose built student accommodation.	No change.
White Young Green <i>representing</i> Leeds Trinity University College	Policy should make reference to supporting additional student accommodation onsite through the intensification of existing accommodation and development of additional accommodation provided within the boundaries of the existing campus.	Policy already supports additional student housing on existing campuses.	No change.
Inner NW Area Committee Planning Sub Group	Should reflect problems with high concentrations of students rather than high concentrations of student accommodation.	The focus of Part B is on purpose built student accommodation.	No change.
Leeds University Union	Council should re-evaluate the impact of favouring purpose built accommodation over private housing for students in the city.	Purpose built accommodation is an important method of housing students and should be encouraged. Policies regarding HMOs are not retrospective or designed to force students into purpose built accommodation.	No change.
<b>Equality – Young People.</b>			
Bury & Walker Solicitors <i>representing</i> Leeds Residential Property Forum	Would have a disproportionate effect on young people. Age is a protected characteristic under the Equality Act 2010. Council's EIA does not reflect this or consider H6 effectively.	Could expand further on how the policy will effect young people within the EIA.	No change. EIA will be reviewed before submission.
<b>Equality – Distribution of HMOs</b>			
Inner NW Area Committee Planning Sub Group	Case for different ceilings for different areas needs to be made.	The policy refers to 'ceilings' though in practice the nature of any potential future policy has yet to be determined. Referring to 'ceilings' set by supplementary advice can be misinterpreted and should be clarified.	PC (minor) – Remove reference to ceilings.
Leeds HMO Lobby	Different ceilings on future HMO policy will disadvantage inner city groups who will have higher thresholds. EIA (p10) does not consider this.		
Re'New	Implementation of the policy should reflect the		

	different concentrations of HMOs. Article 4 could be used to prevent an increase in HMOs above a threshold in areas with few HMOs, or where an area is returning to single occupancy residential development.		
<b>Supports the policy and considers it to be sound.</b>			
Leeds HMO Lobby Jessica Kirk Mr Lee Davidson Turnways & Laurel Bank Residents' Association Mr Martin Staniforth Cllr John Illingworth Ash Road Resident's Association Ashley Inwood Mr & Mrs Eveleigh and Michael Bradford Kate Evans Re'New Moor Park Residents Association Becketts Park Residents Association Inner NW Area Committee Planning Sub Group Jonathan Long Mr Peter Kirk Mr Andrew Barclay Mr Andrew Pomeroy Mark Rutter Dr Ian Steel Mrs Linda Robbins Rachel Harkess Mr Pantelis Ellis Tinios Mr Alistair Stead Mr Howard Eaglestone Dr David Salinger		Over all support for the policy.	No change
<b>Universities</b>			



White Young Green <i>representing</i> Leeds Trinity University College	Request that paragraph 5.2.18 is re-drafted to say "As a city with three universities", to reflect Trinity receiving university status.	Trinity is currently a University College, the text as it stands could be considered incorrect.	PC (minor) - Change text to refer to Leeds as a University City.
Inner NW Area Committee Planning Sub Group	Text is incorrect, Leeds has three Universities.		
<b>Focus around 'balance and health of communities'</b>			
Bury & Walker Solicitors <i>representing</i> Leeds Residential Property Forum	'Balance' is not a valid concern of planning law. It is outside the scope of planning powers.  The proposal misunderstands and misapplies the concept of a mixed community in terms of the NPPF.	'Balance' and 'balanced communities' is mentioned as an aim of planning throughout national legislation including the NPPF.  The term 'mixed community' is used throughout planning and is interchangeable with 'balanced' and 'sustainable'.	No change.  No change.
Inner NW Area Committee Planning Sub Group	Should address loss of housing suitable for families which has had a significant impact on the balance and sustainability.  Term 'health' and 'wellbeing' are confusing, should be replaced with 'sustainability.'	The text implies this, but could possibly make this clearer.  'Health' and 'wellbeing' are both mentioned in the NPPF. These terms are considered as clear as 'sustainability'.	PC (minor) – amend text of 5.2.18 to clarify.  No change.
Rentinc & Parklane Properties	Planning has nothing to do with 'balance of communities' and not sure what would be considered a high concentration of HMOs.	The need for balanced communities is mentioned throughout national policy.	No change.
<b>Impact on Housing.</b>			
Bury & Walker Solicitors <i>representing</i> Leeds Residential Property Forum	SHMA identifies a need/demand for HMOs. Policy doesn't reflect this.	The policy recognises that the SHMA anticipates growth in the need for HMOs	No change.
Re'New	Landlords are concerned that should they invest to let to single occupants they would then be unable to let to multiple occupants in the future should market conditions change.	This matter needs consideration and has also been raised during consultation workshops. However, it is too detailed for inclusion in the Core Strategy and should be considered elsewhere.	No change.
<b>Policy has never been subjected to formal consultation.</b>			
Bury & Walker Solicitors <i>representing</i>	Policy H6 has not been subject to prior public consultation as part of its formulation and	Policy H6 was included in the Preferred Approach, albeit under the heading 'Location of	No change.

Leeds Residential Property Forum	development.	Specialist Housing'. The policy included references to the distribution of specialist housing and HMOs were one form considered. The policy was originally written before the change in the Use Class Order and has been expanded since this to include HMOs.	
<b>Scope of policy.</b>			
Re'New	The policy is dominated by issues relating to HMOs for students but increasingly shared housing is a form of affordable housing as it enables young workers to meet their needs in an affordable format. The text should reflect that.	Text does mention young people and young workers who can not afford to buy properties. Perhaps could be clearer.	PC (minor) – look to include references to young people and other groups reliant on HMOs.
Re'New	The text should include reference to welfare reform proposals that restrict the housing benefit paid to people aged 25 – 35	The text makes reference to anticipated demand for HMOs from young people reliant on housing benefit.	No change.
<b>SPD not suitable for further policy.</b>			
Bury & Walker Solicitors <i>representing</i> Leeds Residential Property Forum	Using SPD rather than DPD avoids examination. Manchester Inspector concluded this approach was not appropriate.	The Core Strategy is a strategic document that will remain in place until 2028. HMO distribution has changed rapidly over the past 10 years and may change further in the future. Additional planning advice may be needed to deliver the strategic aims of Policy H6 and the Council is considering this. However, not all of these approaches involve the publication of an SPD for HMOs and on this basis the text in Policy H6 is potentially misleading.	PC (minor) – Remove specific reference to supplementary planning advice.
National Landlords Association	Highly inappropriate to implement this policy through an SPD, and also avoids scrutiny.		
<b>Additional comments on the text</b>			
Inner NW Area Committee Planning Sub Group	Should also mention Sui Generis large HMOs.	Reference to Sui Generis HMOs could be added to the text.	PC (minor) – Add reference to Sui Generis HMOs
	Term 'high concentrations' should be used instead of 'over concentrations'.	The document uses all of these terms but its meaning is still clear.	No change.
	Fails to mention parking.	Parking is considered elsewhere in the document. Policies T1 & T2 consider residential parking in the city and this can include HMOs.	No change.

	B)iv) Term 'quiet' should be removed. Should also mention harm to residential amenity.	Could be more clear on this point.	PC (minor) – Remove 'quiet' from the text of H6 B iv).
Rentinc & Parklane Properties	In terms of conversions, feel minimum size of 100m2 gross would exclude properties that are capable of conversion.  Should not set standards for car parking.  Should not be a requirement for level access from the street.	This policy is in the UDP and has been through that examination process, as well as being quoted in section 78 appeals. No evidence has been provided of why it should be a different figure.  Parking is considered as part of any application involving conversions.  The policy states level access should be used 'where possible'.	No change.  No change.  No change.
<b>Miscellaneous.</b>			
Mr Cedric Wilks	This policy requires very strict monitoring.	CS policies will be subject to monitoring.	No change.
Irene West	A careful mix of long term residents and student housing helps all concerned to maintain a better place for all to live.	Encouraging mixed communities is an aim of the policy.	No change.
Ms Katy Hockridge	Discriminates against people who need to rent their house out to three people.	The definition of a small HMO was introduced through the creation of Class C4 of the Use Class Order.	No change.
Environment Agency	Conversions should only be acceptable where a place of safety including safe access and egress is demonstrated.	Risk of flooding will be assessed during the application process. Policy EN5 Part (i) deals with this issue.	No change.

## Appendix 2:

### Houses in Multiple Occupation, Student Accommodation, and Flat Conversions

5.2.18a Houses in Multiple Occupation (HMOs) are an increasingly popular part of the housing market within Leeds. As rooms can be rented individually they provide affordable accommodation used primarily by students, young people and those on lower incomes. Whilst the need for this type of accommodation is not in dispute, HMOs tend to be grouped together in certain inner city areas, becoming the dominant type of housing which can lead to social and environmental problems for local communities.

5.2.18b ~~As a city with two universities and a number of specialist colleges,~~ According to figures published by Unipol, Leeds had 43,500 students in 2010/11 of which approximately 30,500 sought accommodation through the private rented sector. *The City's Universities and specialist colleges are an important part of the Leeds economy, but* significant growth in student numbers in the past has led to high concentrations of student housing in areas of Headingley, Hyde Park and Woodhouse. This generated concerns about loss of amenity to long term residents *as well as wider concerns about the loss of housing suitable for families.*

5.2.19 Leeds' SHMA 2010 suggests a levelling off in growth in student numbers in the early years of the Plan which raises question marks over the future of approximately 4000 surplus student bed-spaces. However, demand is expected to continue for many students wanting to live in shared private residential houses which are now classed as HMOs.

5.2.20 The SHMA 2010 anticipates growth in the need for HMOs in the early years of the Plan to accommodate young people reliant on housing benefit and because of strong demand for private rented accommodation from working people unable to buy. This could affect all areas of Leeds, but is likely to be focussed on the inner areas popular for rented property.

5.2.21 Changes in occupation of houses from dwelling-house (class C3 of the use class order) to *small* shared houses (class C4) will require planning permission in the area affected by the HMO Article 4 Direction. This includes all of inner Leeds and the adjoining suburbs. *Changes of occupation to large shared houses (sui generis) already require planning permission in every part of the city. The government has recognised that high concentrations of HMOs in an area can lead to the following impacts:*

- *Increased anti-social behaviour, noise and nuisance*
- *Imbalanced and unsustainable communities*
- *Negative Impacts on the physical environment and streetscape*
- *Pressures upon parking provision*
- *Increased crime*
- *Growth in the private sector at the expense of owner-occupation*
- *Pressure on local community facilities*

- *Restructuring of retail, commercial services and recreational facilities to suit the lifestyles of the predominant population.*

5.2.22a Core Strategy policy needs to balance the need for growth in HMOs with the need to avoid ~~over~~ *high* concentrations which cause loss of amenity and undermine the health and stability of communities. ~~Ease of access to work and universities without needing a car also needs to be considered.~~ *New HMOs should be located in sustainable locations which allow ease of access to work and education by means of sustainable transport, whilst reducing the need to use the private car. Proposals for new HMOs should also look to address detailed local amenity issues such as impacts on neighbours and local parking pressures.*

5.2.22b The decade 2001 – 2010 witnessed considerable development of new purpose built student accommodation particularly in and around the north west sector of the City Centre. Growth in this accommodation is to be welcomed in order to meet need and to deflect pressure away from private rented houses in areas of over-concentration. Nevertheless, care is needed to ensure that purpose built accommodation continues to be located with good access to the universities and does not itself become over-concentrated.

5.2.23 Conversion of houses into flats will be one of the means of meeting need for smaller households. However, this has to be reconciled with the importance of protecting local amenity and creating good standard dwellings with sufficient parking space and security. 'Deconversion' of previously converted flats back into dwelling houses is sometimes sought in order to cater for large families. This will usually be considered acceptable and, if involving only two units to one, does not normally need planning permission.

**POLICY H6: HOUSES IN MULTIPLE OCCUPATION (HMOs), STUDENT ACCOMMODATION, AND FLAT CONVERSIONS**

- A) Within the area of Leeds covered by the Article 4 Direction for Houses in Multiple Occupation (HMOs), development proposals for new HMOs will be determined:
- i) To ensure that a sufficient supply of HMOs is maintained in Leeds,
  - ii) To ensure that HMOs are distributed in areas well connected to employment and educational destinations associated with HMO occupants,
  - iii) To avoid detrimental impacts through high concentrations of HMOs, which would undermine the balance and health of communities.

Additional policy may be needed in the future to deliver the strategic aims of Policy H6. ~~Based on these criteria, supplementary planning advice will set ceilings for the proportion of HMOs desirable in different geographies of Leeds.~~

- B) Development proposals for purpose built student accommodation will be controlled:
- i) To help extend the supply of student accommodation taking pressure off the need for private housing to be used,
  - ii) To avoid the loss of existing housing suitable for family occupation,
  - iii) To avoid excessive concentrations of student accommodation (in a single development or in combination with existing accommodation) which would undermine the balance and wellbeing of communities,
  - iv) To avoid locations which are not easily accessible to the Universities by foot or public transport or which would generate excessive footfall through quiet residential areas.
- C) Development proposals for conversion of existing houses into flats will be accepted where all the following criteria apply:
- i) The property is not a back-to-back dwelling;
  - ii) The property is of sufficient size (min. 100m sq gross) and the internal layout is shown to be suitable for the number of units proposed;
  - iii) The impact on neighbouring dwellings is not likely to be detrimental to the amenity of their occupants by virtue of the conversion alone or cumulatively with a concentration of converted dwellings, HMOs, or residential institutions;
  - iv) Where there is a demand for family sized accommodation and the property has (or has the potential for provision of) good access to suitable space for private recreation, provision is normally made for at least one family sized unit in the proposed mix of flats;
  - v) Sufficient easily accessible and appropriately located off and on street car and cycle parking is incorporated;
  - vi) The proposed dwellings provide satisfactory internal living accommodation in terms of daylight, outlook and juxtaposition of living rooms and bedrooms;
  - vii) Each dwelling has safe and secure (and where possible, level) access from the street and any parking areas and suitable accessible enclosures are provided for refuse storage.

*Sufficiency of supply' is to be measured with reference to the SHMA, Unipol Data, University Admission Forecasts and the effects of Housing Benefit rule changes*