

**HOUSES IN MULTIPLE OCCUPATION
SUPPLEMENTARY PLANNING DOCUMENT**

**CONSULTATION STATEMENT AND
REPRESENTATION GUIDANCE NOTE**

29th JUNE 2026

1.0 Introduction

- 1.1 This is the consultation statement and representation guidance note for the Houses in Multiple Occupation Supplementary Planning Document (HMO SPD), prepared by Tameside Council. This statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

2.0 Town and Country Planning Regulations (2012)

- 2.1 Regulation 12(a) requires a Statement to be prepared setting out who has been consulted while preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the SPD.
- 2.2 Regulation 12(b) requires a Consultation Statement to be published as part of the formal consultation on the SPD, where formal representations are then invited under Regulation 13. Regulation 12(b) also requires SPDs to be published for a minimum 4 week consultation, specify the date when responses should be received, and identify the address to which responses should be sent.
- 2.3 Regulation 35 requires the consultation documents to be made available during the consultation period online and at the principal office in the local authority area and other place(s) within the area that are considered appropriate.

3.0 Statement of Community Involvement (SCI)

- 3.1 The Tameside SCI sets out how the Council will involve people and organisations in the planning process, including both the preparation of planning policy documents, as well as the determination of planning applications. Consultation of the SPD is being carried out in line with the principle of this document.

4.0 Data Protection

- 4.1 In undertaking public consultation, the Council must act in accordance with the requirements of the general data protection regulations (UKGDPR). You can view how we use, manage and store your data by accessing and reading the Privacy Notice, available on the Tameside website - [Planning-Policy-Privacy-Notice-\(FINAL\).pdf](#)

5.0 Consultation Undertaken in Preparing the Draft SPD

- 5.1 Prior to the preparation of the SPD, the Council introduced an immediate Borough wide Article 4 Direction on 2nd October 2025, removing permitted development rights that would otherwise have allowed a lawful change of use from a dwellinghouse (use class C3) to a small HMO (use class C4). Before its introduction, the direction was discussed at multiple officer briefings, and a collection of slides were prepared setting out the evidence that had been gathered to support the scrutiny process. The introduction of the Borough wide direction was justified by the evidence that was reported to a meeting of the Council's Executive Cabinet on 24 September 2025. After consideration of the representations received the decision was made to confirm the Article 4 Direction by a Delegated Officer Decision Report on 25 March 2026.
- 5.2 Prior to producing the draft HMO SPD, a Habitat Regulations Assessment Screening Opinion and Sustainability Appraisal Screening Statement were produced. Both reports were circulated to statutory consultees (Natural England, Environment Agency and Historic England) in March 2026, for a five week period.
- 5.3 The Council received comments from all 3 statutory consultees, though due to reporting timescales, opportunity only existed to publish 1 of the 3 comments (from Natural England) in the consultation statement which accompanied the draft SPD for consultation. For completeness all 3 comments are now set out below, the overall view of the Habitat Regulations Assessment Screening Opinion, Sustainability Appraisal Screening Statement and draft HMO SPD has not been materially changed.
- 5.4 The comments are as follows:
- Natural England:
 - Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.
 - An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project.

If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.

- Historic England:
 - In terms of our area of interest, given the nature of the SPD, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing Policies contained within an adopted development plan document which has already been subject to a Strategic Environmental Assessment (SEA)/Sustainability Appraisal (SA).
As a result, we would endorse the Authority's conclusion that it is not necessary to undertake a SEA/SA of this particular SPD.
- The Environment Agency:
 - We recognise the key role HMOs can play within the local housing market, while also acknowledging the need to manage their impacts on neighbourhood character, residential amenity, and community cohesion.
 - We agree with the conclusions of the screening assessment and SEA/SA that the HMO SPD is unlikely to have any significant effects on European sites, either alone or in combination with other plans and projects.
 - Overall, we support the Council's intention to provide greater clarity and consistency in the assessment of planning applications for HMO's, subject to any environmental matters being addressed through the ongoing main local plan.

6.0 Consultation on the Draft SPD

- 6.1 The Draft HMO SPD and supporting documentation were made available for a 4-week public consultation period and were available to view on the Council's website.
- 6.2 The documentation was also available to view at the Council libraries during normal opening hours listed in **Appendix 1**.
- 6.3 The 4-week consultation period, where representations were accepted by Tameside Council, commenced on 11 May 2026 and ended on 8 June 2026 at 23:59.
- 6.4 Comments were submitted via:
 - Email - planpolicy@tameside.gov.uk

- Post - Planning Policy Team, Tameside One, PO Box 304, Ashton Under Lyne, Tameside, OL6 0GA
- Online questionnaire – <https://www.surveymonkey.com/r/HMOSupplementaryPlanning>

6.5 Consultees on the draft SPD included local politicians, statutory bodies and other interested parties, who's details were held on the Local Plan Consultation database. Emails or letters were sent to individuals and organisations informing them of the consultation (**Appendix 2**). Consultees were invited to provide their comments as per paragraph 6.4 above, prior to the end of the consultation period.

7.0 Making a Representation - Guidance Note

7.1 The HMO SPD expands on policies within the National Planning Policy Framework, Places for Everyone and The Tameside Unitary Development Plan.

7.2 In making representations, consultees were advised to be as specific and succinct as they could, clearly stating any suggested modifications they believed needed to be made to the draft SPD. Consultees were advised that when submitting a representation by any of the means listed above, that full contact details were provided. Where groups or individuals shared a common view on the Draft SPD, a single representation which represents that view should have been made, rather than several separate representations repeating the same points.

7.3 Demographic information was captured at the end of the online response form, if this is the consultees chosen method of representation response. This was the collection of information about the characteristics of respondents. Effective equality monitoring is a key element in helping Tameside Local Authority meet its legal obligations. However, it was not compulsory to complete this section of the online response form.

7.4 As an open and transparent process, responses in full, including the respondent's name are available to view publicly and therefore could not be made in confidence, although personal information such as postal and email addresses alongside signatures and phone numbers have been redacted. Redacted comments have been summarised using an advanced large language model to support the council in analysing consultation responses. These summaries have been reviewed by planning officers before being published.

- 7.5 Representations could have been accompanied by a request to be notified at a specified address of the adoption of the SPD.
- 7.6 Consultees were informed that the Council will always process their data and information in accordance with UK GDPR and the Data Protection Act 2018. Respondents were made aware of the council's privacy notice in responding to the consultation (as set out above in paragraph 4.1). The Council does not sell consultee information to other organisations. The council does not move consultee information beyond the UK. The Council does not use consultee information for automated decision making.
- 7.7 Following the period of public consultation, the responses received were considered. A number of minor typographical amendments and points of clarification have been made to the SPD, in addition to amendments following consideration of comments that were considered necessary, forming the adopted version, summarised as follows:
- Paragraph 1.3 includes reference to the loss of family homes
 - New paragraph 1.6 to note that the SPD is of a number of material considerations, all of which need to be considered when assessing HMO developments
 - Public houses included in paragraph 2.12
 - Complaints procedures included within paragraph 4.1
 - Section included in paragraph 4.9 to make it explicit that the policy comprises 4 parts, in that proposals for HMOs must comply with all 4 parts.
- 7.8 The adopted SPD is one of a number of documents constituting material considerations in the determination of planning applications in the authority.

8.0 Summary of Representations Received

- 8.1 In total, the Council received 51 responses within the consultation period; 39 via the online questionnaire (residents) and 12 via email (7 statutory bodies, 1 member of parliament, 1 local politician and 3 residents). No responses were received in the post.
- 8.2 On completion of the consultation period, all responses were gathered, read and assessed, and a precis of the main points produced. Responses to comments received during the consultation are detailed in **Appendix 3**, together with any revisions made to the supplementary planning document, as a result.

8.3 The majority of the responses were received from local residents (82%), 3 via email and 39 via the online questionnaire. Of the 42 responses, a summary of their comments is as follows:

- The guidance on garden areas is vague
- There will be a concentration of HMOs around transport hubs
- The SPD fails to take into account other multi-occupancy housing and flats
- A map in the SPD would help to identify where all HMOs are located
- The no more than 10% HMOs within a 50m radius policy would still result in unacceptable concentrations on terraced streets
- There needs to be stronger protection for family homes
- The concentration of HMOs results in issues with parking, bins, noise complaints and more pressure on local services
- Residents concerns should carry more weight
- The SPD does not provide strong enough controls to prevent the over concentration of HMOs.

8.4 7 statutory bodies and national organisations commented on the draft HMO SPD. 4 stated they had no detailed comments to make, though 3 did make detailed comments:

- **Historic England** made a suggestion that additional wording be included within the SPD relating to HMOs affecting heritage and non-designated heritage assets. Whilst the SPD has not been amended to include considerations to heritage/non-designated heritage assets, paragraph 1.6 has been added to the SPD to specify that HMO developments must be assessed against all material planning considerations, not just the SPD. Thereby, HMO developments must also consider relevant policies contained within PfE, the UDP and the NPPF, which includes development affecting heritage/non designated heritage assets.
- **The Environment Agency** highlighted the inclusion of proportionate references to flood risk, climate change and drainage within the SPD. As per the above, paragraph 1.6 was added to the SPD to clarify that HMO developments must be assessed against all material planning considerations, not just the SPD. Relevant policies contained within PfE, the UDP and the NPPF consider flood risk, climate change and drainage, and thereby the SPD makes no reference to such matters.
- **Transport for Greater Manchester (TfGM)** included comments surrounding the definition of sustainable locations, the application of parking standards and practical design expectations for cycle storage. Bullet points were added to the SPD in paragraphs 4.6 and 4.7, to ensure

the design of cycle storage is covered and secure, and to ensure the storage is convenient and usable to residents.

APPENDIX 1 – Locations where the draft SPD documentation was available for inspection

Ashton Library, Tameside One, Market Place, Ashton, OL6 6BH

- Opening times:
 - o Mon, Weds and Fri 8.30am – 5.00pm
 - o Tues and Thurs 8.30am – 8.00pm
 - o Fri 10.00am – 3.00pm

Denton Library, Town Hall, Market Street, Denton, M34 2AP

- Opening times:
 - o Mon and Thurs 1.00pm – 5.00pm
 - o Fri 9.00am – 1.00pm
 - o Sat 10.00am – 3.00pm

Droylsden Library, Guardsman Tony Downes House, Manchester Road, Droylsden, M43 6EP

- Opening times:
 - o Mon and Thurs 9.00am – 1.00pm
 - o Fri 1.00pm – 5.00pm
 - o Sat 10.00am – 3.00pm

Dukinfield Library, Concord Way, Dukinfield, SK16 4DB

- Opening times:
 - o Mon and Tues 9.00am – 1.00pm
 - o Fri 1.00pm to 5.00pm
 - o Sat 10.00am – 3.00pm

Hattersley Library, The Hub, Stockport Road, Hattersley, SK14 6NT

- Opening times:
 - o Mon, Tues and Thurs 1.00pm – 5.00pm

Hyde Library, Town Hall, Greenfield Street, Hyde, SK14 1AL

- Opening times:
 - o Mon, Tues and Fri 9.00am – 1.00pm
 - o Weds 1.00pm to 5.00pm
 - o Sat 10.00am – 3.00pm

Mossley Library, George Lawton Hall, Stamford Street, Mossley OL5 0HR

- Opening times:
 - o Mon 1.00pm – 5.00pm
 - o Weds and Fri 9.00am – 1.00pm

Stalybridge Library, Trinity Street, Stalybridge, SK15 2BN

- Opening times:
 - Mon and Tues 9.00am – 1.00pm
 - Weds 1.00pm – 5.00pm
 - Sat 10.00am – 3.00pm.

APPENDIX 2 – Draft HMO SPD consultation letter



ASHTON-UNDER-LYNE · AUDENSHAW · DENTON · DROYLSDEN · DUKINFIELD · HYDE · LONGDENDALE · MOSSLEY · STALYBF

STRATEGIC GROWTH
Nicola Elsworth
Director of Strategic Growth

Planning Department, Tameside
MBC, PO Box 304, Ashton Under
Lyne, OL6 0GA
www.tameside.gov.uk

Email
planningmail@tameside.gov.uk

Call Centre: 0161 342 8355
Date: 11th May 2026.

Dear Sir/Madam,

Houses in Multiple Occupation Supplementary Planning Document (HMO SPD) Consultation Draft

We are writing to you as you have previously commented on, or expressed interest in, one of Tameside's planning documents.

Notice is given that Tameside Council has prepared a Draft HMO SPD, and that this, along with its supporting material, are published for consultation.

The Council currently provides brief planning guidance for HMOs contained within local and national policies, including those within the National Planning Policy Framework (2024), Places for Everyone (2024) and the Tameside Unitary Development Plan (2004). However, the Council has recognised the need to provide further policy guidance to potential applicants preparing proposals specifically for HMOs, and thereby the SPD expands on current adopted policies.

The Council is currently inviting comments as part of the consultation on its intention to introduce a HMO SPD, where we would welcome any comments which will assist us in informing the SPD.

The Draft HMO SPD and supporting documentation are available to view on the Council's website throughout the consultation period:

<https://www.tameside.gov.uk/planning/supplementary-planning-documents/draft-houses-in-multiple-occupation-supplementary-planning-document>

In addition, reference copies of the Draft HMO SPD and its supporting material are available at Council libraries during normal opening hours, listed in **Appendix A** below.

Comments should be submitted in writing by any of the following means:

- Email: planpolicy@tameside.gov.uk
- Post: Planning Policy Team, Tameside One, PO Box 304, Ashton Under Lyne, Tameside, OL6 0GA
- Online questionnaire:
<https://www.surveymonkey.com/r/HMOSupplementaryPlanning>

If commenting via email or post, please include the name and address of the respondent.

All comments should be received by the Council no later than **8 June 2026 at 23:59**.

Please note that all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information, such as postal and email addresses will not be published, but your name and organisation will, if relevant.

Tameside Council maintains a database of consultees who wish to be kept informed about the Council's planning policies. In responding to this consultation, your contact details will automatically be added to the consultation database (if not already held). If you do not want to be contacted about further local planning policies, please state so in your response.

Should you have any queries regarding the proposed Draft HMO SPD, please contact the planning policy team on 0161 342 8355 or via planpolicy@tameside.gov.uk.

Yours sincerely,
Daniel Wheelwright.

APPENDIX A – Locations where the SPD documentation is available for inspection

Ashton Library, Tameside One, Market Place, Ashton, OL6 6BH

- Opening times:
 - o Mon, Weds and Fri 8.30am – 5.00pm
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 - o Sat 10.00am – 3.00pm.

APPENDIX 3 - Summary of consultation comments on the Draft Houses in Multiple Occupation SPD.

The following section summarises the main comments received during the consultation period, which is presented in tabular form, for ease of understanding.

Reference	Organisation	Representation	Council response	Implication for the Draft HMO SPD
1.	National Highways Shivam Sagwal	We do not consider the SPD to have any direct implications for National Highways of the Strategic Road Network. The SPD focuses on the Council's general approach to securing planning obligations and does not introduce any site-specific proposals, allocations, or policy changes that would generate new impacts on the SRN. As such, it does not affect the operation, safety, or capacity of the SRN, and we have no detailed comments to provide.	The Council acknowledges this comment and thanks the consultee for responding.	None.
2.	Natural England Sharon Jenkins	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	The Council acknowledges this comment and thanks the consultee for responding.	None.
3.	Historic England James Langler	Currently, the document provides no consideration of how proposals for HMOs affecting the significance of listed buildings or conservation areas would be determined. As such, we would request that the document includes the following statement to address proposals for HMOs that affect heritage assets:	Planning applications for HMOs should not be assessed solely against the HMO SPD. Instead, they must be considered in	Paragraph 1.6 added to explain the Council's response.

		<p><i>“Proposals for HMOs affecting heritage assets, designated and non-designated, will be considered in line with the requirements of Places for Everyone Policy JP-P2 and national planning policy on conserving and enhancing the historic environment.”</i></p> <p>This could be inserted as an additional bullet point under paragraph 5.6 dealing with design.</p>	<p>conjunction with all relevant adopted policies, including those set out in the Unitary Development Plan (UDP), Places for Everyone (PfE), and the National Planning Policy Framework (NPPF), which set out policies relating to the historic environment.</p>	
4.	<p>Canal and River Trust Simon Tucker</p>	<p>The Trust have reviewed the document/policies contained within the document and based on the information available, we have no comments to me.</p>	<p>The Council acknowledges this comment and thanks the consultee for responding.</p>	<p>None.</p>
5.	<p>Coal Authority Melanie Lindsley</p>	<p>It is noted that this current consultation relates to an SPD on Houses in Multiple Occupation and I can confirm that the Planning team at the Coal Authority have no specific comments to make on this document.</p>	<p>The Council acknowledges this comment and thanks the consultee for responding.</p>	<p>None.</p>
6.	<p>TfGM James McCutcheon</p>	<p>TfGM is supportive of the overall objectives of the SPD in seeking to manage HMO development in a manner that contributes to balanced, sustainable and well-connected neighbourhoods.</p> <p>1. Definition of sustainable locations</p>	<p>The Council acknowledge TfGM’s comments in relation to greatly defining sustainable locations, though consider the</p>	<p>Bullet point included within paragraph 4.6, to ensure the design of cycle storage is covered and secure.</p>

		<p>TfGM considers that the use of distance-based measures provides an appropriate basis for assessment, however, further refinement would be beneficial in order to reflect a broader appreciation of accessibility. This should include consideration of public transport service frequency, connectivity to key trip generators, and the quality, directness, safety and attractiveness of walking, wheeling and cycling routes. TfGM also recommends that the Council utilises the Department for Transport’s Connectivity Tool as part of the wider evidence base to identify where transport interventions may be required to support development.</p> <p>2. Application of parking standards to HMOs</p> <p>TfGM notes that the emerging Tameside Local Plan establishes a clear borough-wide approach to parking through Policy HSP T8 and Appendix C: Parking for All. The SPD should therefore set out more clearly how these standards, together with any relevant location-based considerations, are expected to be applied in the context of HMO proposals in order to provide applicants and decision-makers with a consistent basis for determining appropriate provision. TfGM also considers that, in some circumstances, a very low level of parking provision for HMOs may give rise to on-street parking pressures. In this respect, the SPD may benefit from recognising that parking provision</p>	<p>principles of paragraph 4.8 of the SPD to be sufficient.</p> <p>HMO developments are to be assessed against the SPD and all other material considerations (PfE, UDP and the NPPF). Paragraph 4.8 of the SPD requires HMO developments to be within 400m of a bus stop and 800m of the nearest rail station/tram stop, reducing reliance on cars.</p> <p>The Council appreciate the comments in relation to design expectations for cycle storage and so have amended the SPD accordingly. The Council do not consider cycle storage for visitors</p>	<p>Bullet point included within paragraph 4.7 to ensure cycle storage is convenient and useable to residents.</p>
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		<p>should be informed not only by a broad location-based standard, but also by the specific characteristics of the site and surrounding area, with scope for case-by-case consideration where required.</p> <p>3. Practical design expectations for cycle storage TfGM supports the requirement for cycle parking to be provided for each HMO resident. Whilst the emerging Local Plan and Appendix C: Parking for All provide a strong strategic basis for cycle parking provision, the SPD could set out how this should be delivered in practice for HMO schemes, including expectations in relation to convenient access, security, weather protection and day-to-day usability for residents. Consideration should also be given in certain cases, to whether additional short-stay provision may be appropriate, including to support visitors or cycle-based deliveries. More generally, cycle parking provision associated with HMO development should be of a type and quality that supports cycling as a realistic option for local journeys and for first and last mile access to nearby public transport nodes.</p>	and deliveries to be a requirement.	
7.	Environment Agency Chris Nugent	<p>The Environment Agency raises no objection in principle to the SPD and considers that it broadly fulfils its intended role.</p> <p>However, to ensure full consistency with the development plan, Places for Everyone, the emerging</p>	Planning applications for HMOs should not be assessed solely against the HMO SPD.	Paragraph 1.6 added to explain the Council's response.

		<p>Tameside Local Plan, and national policy, we recommend that the SPD is strengthened through clearer cross-referencing to the development plan and emerging policies, alongside the inclusion of proportionate references to flood risk, climate change and drainage, framed as supporting guidance.</p>	<p>Instead, they must be considered in conjunction with all relevant adopted policies, including those set out in the Unitary Development Plan (UDP), Places for Everyone (PfE), and the National Planning Policy Framework (NPPF), which set out policies relating to flood risk, climate change and drainage.</p>	
8.	<p>Member of Parliament Johnathon Reynolds</p>	<p>I welcome the opportunity to respond to Tameside Council's consultation on the Draft Houses in Multiple Occupation Supplementary Planning Document. While existing local and national planning policies provide a framework, there is a clear need for more detailed and locally relevant guidance to ensure that decisions are consistent, transparent and reflect the pressures being experienced in our communities.</p> <p>Across Stalybridge and Hyde constituency, I regularly hear from residents about the impact that poorly managed or overly concentrated HMOs can have on neighbourhoods. These concerns are not about the</p>	<p>The Council acknowledge the support from the MP.</p> <p>The SPD, taken as a whole, aims to mitigate the potential for poorly managed HMOs, their overconcentration, providing high quality accommodation and protecting the amenity</p>	None.

		<p>role of shared housing itself, which clearly contributes to meeting housing need, but about ensuring that development is properly planned, proportionate and well managed. I therefore strongly support the objectives of the SPD, particularly its focus on creating balanced communities, protecting residential amenity and ensuring a good standard of accommodation for those living in HMOs.</p> <p>One of the most important issues raised locally is the question of concentration. In parts of the constituency, particularly around Hyde and Stalybridge town centres, residents have raised concerns about the clustering of HMOs in streets with older terraced housing and good transport links. Areas around Hyde Market Place and central Stalybridge are typical examples where these pressures can emerge. While these locations are often appropriate in principle for this type of housing, problems can arise where development is not properly managed or becomes too concentrated. This can place pressure on parking, waste services and local infrastructure, and can change the character of neighbourhoods over time. It is therefore important that the SPD includes clear and robust guidance on managing concentration, supported by local evidence and applied consistently through the planning process.</p>	<p>of existing neighbouring residents.</p> <p>Paragraph 4.9 of the SPD (points 1 to 4) aims to mitigate the over concentration of HMOs.</p> <p>Paragraph 4.1 of the SPD requires a management plan to be submitted with an application for a HMO development. If the HMO development be approved, it would be required to operate in accordance with the management plan, which should mitigate for any poor management.</p>	
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		<p>Alongside this, the quality and ongoing management of HMOs is critical. Poorly managed properties can contribute to issues such as noise, waste problems and antisocial behaviour, which impact neighbours as well as tenants. The SPD should set clear expectations not only at the point of planning approval, but also around longer term management and maintenance. This includes practical matters such as appropriate waste storage, maintaining properties to a good standard, and ensuring landlords act responsibly where issues arise.</p> <p>In some areas, these concerns intersect with wider community safety issues. For example, in locations such as around Hyde town centre, residents have raised concerns about how certain properties and nearby premises can become focal points for late-night activity, contributing to anti-social behaviour. While planning policy cannot address these issues alone, it can play an important role in preventing conditions that allow problems to develop in the first place.</p> <p>It is also important to recognise the positive role that HMOs can play. They provide flexible and often more affordable accommodation for a range of residents, including young workers, people on lower incomes and those in transition. The aim of the SPD should not</p>		
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		<p>be to restrict this type of housing unnecessarily, but to ensure that it is provided in the right locations, to a high standard, and in a way that supports the wider community.</p> <p>Finally, the SPD should offer clear and practical guidance for applicants. Greater clarity around expectations will help support higher quality proposals from the outset, reduce uncertainty in the planning process and lead to better outcomes for both residents and developers.</p> <p>Overall, I welcome the direction of this draft SPD and the Council's work to strengthen guidance in this area. Striking the right balance is essential. We need to ensure that HMOs continue to meet housing need, while also protecting neighbourhood character, supporting community cohesion and maintaining a good quality of life for residents. I hope these comments are helpful and I would be happy to continue engaging as the document is refined.</p>		
9.	Local Councillor Councillor Beardmore	On the whole I am very supportive of the measures contained within the SPD - to both ensure the best possible standards in terms of accommodation in houses of multiple occupancy, as well as to limit the concentration of HMO's in certain areas.	The Council acknowledge the support from the local councillor.	Section added to paragraph 1.3 to include the loss of family homes. Bullet point included in paragraph 4.1, requiring complaints procedures to also be

		<p>As Ward Councillor for Stalybridge North Ward, I have direct experience of the challenges involved where high numbers of HMO's have been developed in a relatively concentrated area of the Ward. This has substantially changed the housing and population make up of the area, leading to a more transient community, dependent in many cases on private landlords who live outside of the ward, and indeed the Borough. From this perspective, I would like to submit the following comments:-</p> <p>Paragraph 1.3 - I would like acknowledgement that concentrations of HMO's in areas can lead to less family housing to be included in this paragraph, since this has an impact on the demographic of the area.</p> <p>Paragraph 4.1 – 4.7 Management, Design and Functionality. I am very supportive of the proposals to require a management plan for any potential HMO, as well as the strong statements on room size, amenity requirements, minimum shared washing, cooking and dining facilities and adequate outdoor amenity.</p> <p>The importance of adequate waste storage and removal cannot be overstated, since this has been a reoccurring issue for us as Ward Councillors. I also agree with issues around large Biffa type bins sitting</p>	<p>Paragraph 4.6 of the SPD covers the location of refuse bins.</p> <p>Paragraph 4.8 of the SPD covers sustainable locations. Whilst this requires HMOs to be within 400m of the nearest bus stop and 800m of the nearest rail station or tram stop, paragraph 4.9 of the SPD must also be applied to proposals for HMOs, which should mitigate for an over concentration in these sustainable locations.</p> <p>Planning policies surrounding highway safety are included with the UDP, PfE and NPPF. The SPD should be considered in conjunction with other</p>	<p>considered within submitted management plans.</p>
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		<p>on the pavement. We have seen these bins encroaching onto the pavements, causing obstructions and potential health hazards when waiting to be emptied. If the waste cannot properly be stored within the curtilage of the development it should not be approved.</p> <p>With regard to the management statement, in the event of developers and landlords living outside of Tameside I would like to see assurances about how the HMO will be managed locally through a local agent.</p> <p>4.8 Sustainable Transport</p> <p>While I accept the need for HMO's to be located near public transport, this can in practice lead to a paradox in that the proximity to transport networks results in over concentrations of these types of properties. For example, the concentrations of HMO's in Stalybridge - around Norman Road, Stamford Street, Ridge Hill Lane, which is in close proximity to Stalybridge Train Station.</p> <p>While proximity to public transport is key, we know from experience that people who live in HMO's also drive cars. I am disappointed that there was little reference to the need to control parking in areas of HMO concentration. I would also add that some HMO developments are proposed on main roads and near</p>	<p>relevant planning policies.</p> <p>Point 1 of paragraph 4.9 requires proposals not to result in 3 or more adjacent properties in a continuous frontage within the street scene being used as a HMO. This means there can only be a maximum of 2 HMOs in a continuous frontage. This is shown in example 2 and 3.</p> <p>The Article 4 Direction and enforcement activity where appropriate will mitigate any new HMOs going unnoticed. Additionally the Council holds information regard to licensing, council tax and building control, which the</p>	
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		<p>very busy junctions so would expect some reference to road safety concerns. Would this be considered separately to this SPD?</p> <p>Paragraph 4.9 Mitigating the over concentration of HMOs and ensuring balance, the loss of family homes and the impact on existing neighbouring amenity</p> <p>I agree with all four options outlined in the SPD for mitigating over concentration. However, while I can understand the need for a standardised set of criteria to judge HMO concentration, the negative impact of this concentration is more severe in areas with certain types of housing and street layouts. For example, in areas of tightly packed two up - two down terraced housing, with very narrow roads in between, known locally as <i>grid irons</i>.</p> <p>In relation to the SPD's Option 1 for example, to have three properties in a line on both sides of Hamilton Street in Stalybridge would take up a large proportion of the frontage of the street and have more impact on the neighbourhood than three large semi - detached properties on either side of a main road e.g on Mottram Road.</p> <p>Similarly, in relation to Option 4, which I support, we know that smaller HMO's have been developed in</p>	<p>Council will continue to monitor and update.</p> <p>Parts 3 and 4 of paragraph 4.9 of the SPD require a set percentage of properties to be assessed within a defined radius. As a result, this approach does take into account whether an area is densely or sparsely populated ensuring a consistent approach, and outcomes that are reflective of the local context.</p>	
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		<p>areas of two bedroomed terraced housing which have gone under the radar in terms of Licensing and planning permission. Option 4 will only be effective as a control if we know where all HMO's are located within the 50m radius.</p> <p>In these instances, where we have good local knowledge that areas have reached saturation point, we should identify hotspots (streets, or parts of streets) which, for whatever period, should restrict any HMO development.</p>		
10.	Resident Adrian Pearce	<p>I welcome and support the further detail and clarity this draft SPD gives to the Article 4 Direction and Policy HSP H5 contained in Homes Spaces Places. Furthermore, I note that some of our previous concerns raised in the consultation on Policy HSP H5 have been acted upon.</p> <p>I have, however, a number of comments relating to the draft SPD:</p> <p>4.3 The guidance on garden areas and open space associated with an HMO is vague and its interpretation subjective. Particularly in smaller properties, the space necessary for bin or waste storage, drying facilities and bike spaces could compromise the need for a specific space where people might wish to sit out or children play. It would therefore follow, that for a property with</p>	External communal space (garden) is covered in paragraph 4.4 of the SPD and requires the size of outdoor space to correspond with the number of residents, and to not be dominated by bike and bin storage. Every site and HMO proposal is different and so the SPD must not be overly prescriptive.	

		<p>limited outdoor space, multiple occupancy would not be appropriate. The Guidance therefore needs to contain clearer space standards and criteria so that both occupants, and Planning Officers can assess the suitability of a property more objectively. In short, the SPD needs to clearly state that functional amenity space is additional to that used for storing waste etc.</p> <p>4.7 There are already concentrations of HMOS around transport hubs e.g around Stalybridge Railway Station. If strict criteria are applied which state that HMOS should be no more than 400m to the nearest bus stop or 800m to the nearest rail station or tram stop, this will tend to encourage HMOS to locate in areas of existing high concentrations and exclude parts of the borough where there are few HMOS. Expanding the areas where HMOS could locate would reduce CONCENTRATIONS around transport hubs and existing "hot-spots".</p> <p>7.8 HMOS in terraced property, particularly smaller 2-bed properties, can exacerbate existing problems such as parking and waste. The criteria set out in section 7.8 of the draft SPD of no more than 10% HMOS within a 50m radius would, in these instances, still mean unacceptable concentrations on terraced streets where parking, and amenity space at the back of properties, are at a premium. The Draft SPD fails to</p>	<p>Paragraph 4.8 of the SPD covers sustainable locations. Whilst this requires HMOs to be within 400m of the nearest bus stop and 800m of the nearest rail station or tram stop, paragraph 4.9 of the SPD must also be applied to proposals for HMOs, which would mitigate for an over concentration in these sustainable locations.</p> <p>Parts 3 and 4 of paragraph 4.9 of the SPD require a set percentage of properties to be assessed within a defined radius. As a result, this approach does take into account whether an area is densely or sparsely populated ensuring a</p>	
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		<p>take into account the multiple impact of HMOs, other multi-occupancy housing and flats, or nearby commercial uses have upon small neighbourhood areas.</p> <p>7.8 Should also contain criteria which take into account levels of crime or Police concerns.</p> <p>Measuring area capacity for HMOS: It is also the case that in some "hotspot" areas, there are HMOS or other multi-occupancy properties that are not registered for various historic or administrative reasons. A case in point would be properties managed by Social Registered providers. The criteria of an SPD needs to measure this to assess the capacity of an area for additional HMOS.</p> <p>I would also support a map in the SPD identifying designated streets or neighbourhood as "hotspots", where saturation has been reached already measuring against the criteria set out in section 7.8 of the Draft SPD and my comments above, which might be reviewed at given intervals, to prevent the establishment further HMOS.</p> <p>Noise: One issue that has come up at Speakers' Panel is noise nuisance for adjoining residents by the conversion of bed-rooms into living space. Criteria in</p>	<p>consistent approach, and outcomes that are reflective of the local context.</p> <p>Noise nuisances can arise from poor management of HMOs and too many residents living within the HMO. Policies within the SPD aim to address these issues.</p>	
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		the SPD needs to measure, control and mitigate this issue.		
11.	Resident Ms Whittam	<p>Objects to the draft HMO SPD, as it does not go far enough to protect areas like Denton from the impact of HMOs</p> <p>When too many family homes are converted to HMOs or other high density accommodation, the whole area changes.</p> <p>Applications for HMOs are too often looked at individually, instead of looking at the bigger picture. One HMO may not seem like a problem on its own, but when more start to appear, the impact builds up quickly (parking, bins, noise complaints, more pressure on local services).</p> <p>The SPD should include strict controls, including:</p> <ul style="list-style-type: none"> • A proper cap on how many HMOs can exist within the same area. • Stronger protection for family homes. • Mandatory parking assessments before approval is given. • Greater consideration of the cumulative impact on existing residents. • Tougher enforcement against landlords who do not properly manage properties. • Minimum distance rules between HMOs. 	<p>The purpose of paragraph 4.9 (points 1 to 4) of the SPD is to mitigate the overconcentration of HMOs, to ensure balance, the loss of family homes and the impact on neighbouring amenity. Reducing the over concentration of HMOs should thereby mitigate issues surrounding parking bins etc.</p> <p>The requirement for cycle storage and for HMOs to be within a sustainable location, would reduce the need for cars.</p> <p>HMOs provide flexible and often more affordable</p>	None.

		<p>Residents' concerns should carry more weight. The priority should be protecting balanced communities and preserving family housing, not allowing gradual overdevelopment through increasing numbers of HMOs.</p> <p>The SPD should be strengthened significantly before adopting it and to consider stronger planning controls in areas like Denton where residents are already feeling the pressure on infrastructure and parking.</p>	<p>accommodation for a range of residents, including young workers, people on lower incomes and those in transition. Putting a cap on the number of HMOs in area would be contrary to the outcome of the Equalities Impact Assessment and not consistent with national planning policy.</p>	
12.	Resident Mr Taylor	<p>The SPD goes against what most of the electorate want. It is mainly to home illegal immigrants, which is costing the working public badly. The Council already welcome these unwanted people who are a drain on us all. Two days ago, there were 3 African immigrants sat watching the children playing in Cheetham Park. They did not speak English, and then headed back towards Stalybridge Centre. The Council are welcoming this scum into out towns.</p>	<p>The SPD aims to ensure proposals for HMOs are of a high quality and contribute to sustainable and balanced neighbourhoods, whilst protecting residential character and amenity.</p> <p>The SPD does not consider the demographic/make up</p>	None.

			of potential residents of a HMO.	
13.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
14.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
15.	Resident	Complete questionnaire – strongly disagrees with the draft HMO SPD but provided no further comments.	The Council thanks the consultee for responding.	None.
16.	Resident	Incomplete questionnaire – disagrees with the draft HMO SPD but provided no further comments.	The Council thanks the consultee for responding.	None.
17.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
18.	Resident	<p>Complete questionnaire – strongly disagrees with the draft HMO SPD and made the following comments: I wish to formally object to the proposed HMO development in Ashton Waterloo due to serious safeguarding and community welfare concerns.</p> <p>The immediate area already contains a high concentration of vulnerable residents and sensitive community facilities, including:</p> <ul style="list-style-type: none"> • Three primary schools • Two care homes 	<p>The Council acknowledges this comment and thanks the consultee for responding.</p> <p>The demographic/make up of potential residents of a HMO is not material planning consideration, and</p>	None.

		<ul style="list-style-type: none"> • One retirement residential living facility. <p>This proposal raises significant concerns regarding the suitability of introducing a high-occupancy HMO into an area heavily used by children, elderly residents, and vulnerable adults.</p> <p>The local infrastructure is already under pressure, and the introduction of an HMO may negatively affect:</p> <ul style="list-style-type: none"> • Community safety and safeguarding • Traffic and parking congestion near schools • Noise and anti-social behaviour concerns • Pressure on local health and support services • The wellbeing and quality of life of elderly residents <p>Given the concentration of schools and care facilities in close proximity, I believe the proposed development is incompatible with the character and safeguarding needs of the area.</p> <p>I respectfully request that the planning authority carefully consider the cumulative impact this development may have on vulnerable members of the community and reject any application.</p>	<p>thereby is not referenced within the SPD.</p> <p>The proximity of HMOs to schools is not a contributing factor in the determination of a planning application for a HMO development.</p>	
19.	Resident	<p>Complete questionnaire – strongly disagrees with the draft HMO SPD and made the following comments: Literally right next to a primary school.</p>	<p>The Council acknowledges this comment and thanks</p>	<p>None.</p>

			the consultee for responding.	
20.	Resident	Complete questionnaire – agrees with the draft HMO SPD, but provided no further comments.	The Council thanks the consultee for responding.	None.
21.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
22.	Resident	Complete questionnaire – strongly disagrees with the draft HMO SPD and made the following comment: There are too many in the area. The properties being changed from 2/3 family houses to 3-6/7 HMOs. How long are the housing waiting lists. Families are crying out for 2 or 3 bedroomed homes.	Paragraph 4.9 of the draft SPD aims to mitigate an over concentration of HMOs, as a result, reducing the loss of family homes and ensuring balanced neighbourhoods.	None.
23.	Resident	Complete questionnaire – strongly agrees with the draft HMO SPD, and made the following comments: The supplementary planning document seems very sensible and will give greater control for the Council on small HMOs in future, their location and their quality.	The Council acknowledges this comment and thanks the consultee for responding.	None.
24.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
25.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.

26.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
27.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
28.	Resident	Complete questionnaire – strongly disagrees with the draft HMO SPD and made the following comments: I don't believe 'Tamesiders' want or need HMO's, I believe that these types of residences only devalue homes in the immediate area, damage local communities, put extra strain on our already over subscribed schools, GP surgeries and hospitals. The majority in my opinion will suffer for the minority.	The Council acknowledges this comment and thanks the consultee for responding.	None.
29.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
30.	Resident	Complete questionnaire – disagrees with the draft HMO SPD and made the following comments: I am against the Houses in Multiple Occupation Supplementary Planning Document as I believe it does not adequately protect existing residential communities. I am concerned that an increase in HMOs can lead to issues such as noise, parking difficulties, waste management problems, and antisocial behaviour, all of	Paragraph 4.1 addresses effective management of a HMO. Paragraphs 4.6, 4.7 and 4.8 address matters surrounding parking and waste. Paragraph 4.9 of the draft SPD aims to	None.

		<p>which can negatively affect the quality of life for long-term residents.</p> <p>I also feel the conversion of family homes into HMOs reduces the availability of housing for families and can alter the character and balance of neighbourhoods, placing extra pressure on local services.</p> <p>Overall, I do not think the document provides strong enough controls to prevent overconcentration of HMOs, and I believe greater protection for established communities is needed.</p>	<p>mitigate an over concentration of HMOs, as a result, reducing the loss of family homes and ensuring balanced neighbourhoods.</p>	
31.	Resident	<p>Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.</p>	<p>The Council thanks the consultee for responding.</p>	<p>None.</p>
32.	Resident	<p>Complete questionnaire – neither agrees nor disagrees with the draft HMO SPD, but made the following comments:</p> <ul style="list-style-type: none"> • Take into account comments by individual groups/ parish councils • How to deal with existing non-compliant HMOs • How to follow up HMO non-compliant requirements • Include definition of age of children (national policy refers) • Include pubs/hotels in 2.12 • Include details of fire escapes • Include Emmaus in clause 2.13 	<p>Individuals groups/parish councils have the opportunity to comment on planning applications for HMOs. Their comments are considered as part of the planning assessment.</p> <p>Non-compliant HMOs are dealt with via different legislation, as</p>	<p>‘Public houses’ has been included within paragraph 2.12 of the SPD.</p>

			<p>is the requirement for fire escapes/doors.</p> <p>The purpose of the SPD to ensure new and retrospective applications for HMOs contribute to sustainable and balanced neighbourhoods, while protecting residential character and amenity.</p> <p>Emmaus is a homelessness charity, considered sui generis use, which is included within paragraph 2.13.</p>	
33.	Resident	Complete questionnaire - neither agrees or disagrees with the draft HMO SPD, but provided no further comments.	The Council thanks the consultee for responding.	None.
34.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
35.	Resident	Complete questionnaire – disagrees with the draft HMO SPD, but provided no further comments.	The Council thanks the consultee for responding.	None.

36.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
37.	Resident	Complete questionnaire – disagrees with the draft HMO SPD, but provided no further comments.	The Council thanks the consultee for responding.	None.
38.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
39.	Resident	Complete questionnaire – strongly agrees with the draft HMO SPD, but provided no further comments.	The Council thanks the consultee for responding.	None.
40.	Resident	Complete questionnaire – strongly disagrees with the draft HMO SPD and made the following comments: HMO's are normally where either illegal immigrants or drink and drug users. Top Mossley now has quite a few HMO'S with illegal immigrants housed in them, they walk around harassing women and children.	The SPD does not consider the demographic/make up of potential residents of a HMO, rather it aims to ensure that new HMO developments contribute to sustainable and balanced neighbourhoods, while protecting residential character and amenity.	None.
41.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.

42.	Resident	Complete questionnaire – strongly disagrees with the draft HMO SPD and made the following comments: HMO’s have no place in society.	The Council acknowledges this comment and thanks the consultee for responding.	None.
43.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
44.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
45.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
46.	Resident	Complete questionnaire – strongly agrees with the draft HMO SPD and made the following comments: It’s clear and easy to understand so every landlord will be able to abide by it.	The Council acknowledges this comment and thanks the consultee for responding.	None.
47.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
48.	Resident	Incomplete questionnaire – strongly disagrees with the draft HMO SPD and made the following comments: We do neither want or need HMO’s in Tameside it does in no way help Tameside, it is detriment to us and it cost us money for something we don’t want this from this rotten fabien government. We strongly	The Council acknowledges this comment and thanks the consultee for responding.	None.

		disagree with these young men who we neither no or you do not know who they are. Stop mass migration and false asylum seekers coming from France and we demand you stop this globalist agenda to destroy the west and Britain and the destruction of our nation.		
49.	Resident	Complete questionnaire – neither agrees or disagrees with the draft HMO SPD, and made the following comment: Far too many.	Paragraph 4.9 of the draft SPD aims to mitigate an over concentration of HMOs, as a result, reducing the loss of family homes and ensuring balanced neighbourhoods.	None.
50.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.
51.	Resident	Incomplete questionnaire - no comments submitted in relation to draft HMO SPD.	The Council thanks the consultee for responding.	None.