

Transport for London (TfL)

Thank you for consulting Transport for London (TfL). We have the following comments on the draft Houses in Multiple Occupation (HMO) SPD.

3. – Other Relevant Considerations

The SPD doesn't include any locational criteria for HMOs setting out expectations in terms of minimum access to services, active travel or public transport connectivity. We commend the approach adopted by Brent Council which requires minimum levels of access to local amenities and for all HMOs to be located in areas of PTAL 3 or above to ensure that there is good public transport connectivity. This helps to support a requirement for HMOs to be car free and permit free.

5. – Standards

Vehicle Parking Standards

To ensure compliance with London Plan Policy T6.1 there should be no general car parking for HMO developments. At the start of 5.6 it needs to be stated clearly that all new build HMO developments should be car free apart from disabled persons' parking and section 5.7 on electric vehicle charging should clarify that it is only talking about provision of disabled persons' parking. Similarly 5.8 should require all HMO conversions to be car free apart from disabled persons' parking. In sections 5.9 – 5.10 it should be clarified that residents' permits for parking on street will not be provided if the HMO is located in a CPZ and that in a heavily parked area where a CPZ is not already in place, large-scale HMOs will be required to contribute towards CPZ implementation. In section 5.11 the only situation in which front gardens should be converted, is to provide disabled persons' parking. We also recommend adoption of the approach taken by Brent Council which requires removal of existing car parking and hardstanding where an existing property is converted to a HMO.

Cycle Parking

We welcome the requirement in section 5.15 that new or intensified HMOs should provide 1 cycle parking space per tenanted unit/bedroom. However, this should be stated as a minimum requirement because some larger units may have more than one occupant. There is also a need to provide short stay cycle parking for visitors (minimum of two spaces). The design of cycle parking should cater for adapted and larger cycles as well as cargo bikes.

We hope that these comments are helpful and that they will be incorporated in the final adopted version of the SPD