

# **RIGHT TO RENT**

**EDINBURGH UNIVERSITY STUDENTS' ASSOCIATION'S  
CONSULTATION RESPONSE TO SCOTTISH PLANNING  
POLICY SPP3: PLANNING FOR HOUSING, MARCH 2008**



**EDINBURGH UNIVERSITY STUDENTS' ASSOCIATION  
WWW.EUSA.CO.UK**

## ***Introduction***

Edinburgh University Students' Association represents 25,000 students currently studying at the University of Edinburgh. We are active but autonomous member of the National Union of Students.

We have achieved some excellent outcomes through continued partnership work with key agencies such as the City of Edinburgh Council, local community councils, local letting agencies and landlords. We were instrumental in promoting the benefits of Landlord Accreditation in Edinburgh and actively involved in the development process.

We continue to strive for the best possible facilities for the 63,000 students from universities and colleges across the capital.

## ***Contents***

General response	4
Responding to main Government arguments	5
Arguments against quotas	7
Conclusion	8
Appendix	9
Contacts	11

## ***General Response***

Edinburgh University Students' Association will focus on question five of the consultation document which asks:

**“Do you agree that local authorities should set policies to control the proportion of HMO accommodation in a given unit, where they consider this is necessary? How should maximum proportions be decided?”**

Edinburgh University Students' Association does not see this as a necessary, useful or desirable proposal.

HMOs were first created to guarantee a minimum level of safety in one of the most unsafe sectors of housing. The legislation has had some considerable success in delivering this. However, if this planning policy goes ahead encouraging controls on the proportions of licenses then it will fundamentally change the way HMOs are used in the future.

The concept of HMO Quotas has been debated over a number of years but this is the first time it has been seriously suggested by the Scottish Government. We do not believe that enough evidence has been presented to suggest that concentration has had a negative impact on local amenities or that HMOs harm 'diversity' in a given area.

Instead we would contend that HMOs naturally provide diversity and that Quotas would distort the property market, increase house prices and add to what is already a serious problem in Scotland's housing sector. However, none of these points are addressed or referred to in the consultation document.

The key proponents of HMO limits or quotas have often been residents who are unhappy with the behaviour of the occupants of HMO properties. We are concerned that this organised local pressure has been influential in developing these proposals and that this policy will encourage local authorities to put in place Quotas in an attempt to socially engineer communities.

## ***Responding to main Government arguments***

The key government argument is that a concentration of HMOs has a negative impact on local amenities. There is also the argument that this concentration can lead to a lack of diversity in a given area which undermines the sustainability of a local community.

However, there appears to be limited evidence to back up these arguments.

For example, no research has been carried out looking into the impacts of existing policies in Edinburgh and Glasgow that aim to limit HMOs. Assessing this would allow the government to make an evidenced-based judgement about whether concentrations of HMOs do have a serious impact on amenities. If evidence does exist then it should be clearly put forward by the Government in order to inform the debate.

However, even if it is shown that HMOs put pressure on particular services or amenities it needs to be recognised that limiting other sectors of the market would be politically unpalatable and would fail to recognise benefits that can be provided from a particular group. If the Government suggested limiting the number of middle-earning families in new estates, in order to guarantee affordable accommodation for first time buyers and ensure a sustainable mix, there would be considerable public opposition.

It is important also to note that arguments about a lack of diversity in housing leading to 'unsustainable communities' should acknowledge the many ways diversity can be considered. To many, a diverse housing mix could include a high proportion of HMOs in the recognition that typically the occupants are not a homogenous group. HMO residents include a large number of young professionals, students, migrant workers, young families and people who have been unable to get social housing. These groups use housing and add to communities in different ways.

Diversity arguments should be cautiously used given that the term in this context has so far been undefined and fails to recognise the diversity within the HMO sector.

Having said this we do also recognise that the concentration of HMOs can present challenges to local communities and local government.

We understand that a high number of HMOs in urban areas can lead to change but this should not be viewed negatively. Young professional and students can often help create a vibrant local economy and contribute positively to the community (see appendix 1). Many inner city areas have changed through different types of housing more than once. This change should not be stopped by a crude misuse of a safety standard mechanism but instead should be

managed so that it benefits as many people in the broader community as possible. Lowering demand by building more housing, improving standards through the national landlord accreditation scheme, and effectively using Anti-Social Behaviour legislation can all help tackle the root causes of the challenges outlined. HMO Quotas cannot.

In summarising the points put forward by the government and other groups, we are surprised by the lack of evidence to suggest a negative impact on amenities and the impact that quotas have had at a local level. This is an important proposal and it is vital that it is informed. We also wish to highlight our view that high proportions of HMOs, rather than undermining diverse and sustainable communities, actually positively add to them.

## ***Arguments against Quotas***

These points relate to the potential impacts of limiting HMOs in an area. None of these points are discussed in the consultation response but are essential to consider.

### **Increase house prices**

The central concern of HMO Quotas is that they will impact on the affordability and availability of accommodation at a time when house prices are unhealthily high. As mentioned, HMO properties are inhabited by young professionals and families, those unable to find social housing, migrant workers and students. These groups often find it difficult to get on the property ladder or even afford to live in an appropriate location. Limiting the number of rentable properties in a given area could hugely distort demand across a wide area and could drive up costs even further.

James Jopling, Head of campaigns for Shelter Scotland, agrees arguing that “Imposing a cap on the provision of HMOs in any area will simply push prices up in those shared flats that fall within the quota.”<sup>1</sup>

### **Lower standards**

Local Councils already highlight that there are a large number of unlicensed Multiple Occupancy properties. If quotas were to be put in place this could make the problem worse. Rogue and dodgy landlords would simply choose not to register.

There is the additional concern that landlords would extend the capacity of their existing properties. This would put a further pressure on the physical state of the buildings but would also directly reduce the standards of accommodation.

Shelter also agree with this contention claiming that “Landlords may also seek to meet the demand that still exists [following the introduction of Quotas] by further subdividing rooms to take more residents, so driving down standards.”<sup>2</sup>

### **Impact on local business**

Many businesses in areas such as Marchmont in Edinburgh, which have a large concentration of HMOs, also have a vibrant local economy dependent on the residents of these properties. If quotas were put in place this would have a direct effect on these businesses.

---

<sup>1</sup> *Quotas for shared flats shouldn't be the way forward*, article by James Jopling (Shelter) in The Scotsman newspaper on 28 March 2008

<sup>2</sup> *Quotas for shared flats shouldn't be the way forward*, article by James Jopling (Shelter) in The Scotsman newspaper on 28 March 2008

## ***Conclusion***

The first main point which justifies our opposition to the idea of limiting HMOs in areas as outlined in the consultation document is that there appears to be a lack of evidence for the proposal. Some cities already have this system in place so it is surprising that these schemes have not been considered when drawing up these proposals.

The second is that there is a lack of acknowledgment about what impact quotas will have on residents, communities and the local economy. The cost of renting or purchasing a property is a significant issue at the moment and these proposals will only agitate further increases in costs whilst also reducing standards and impacting on the broader community.

Edinburgh University Students' Association strongly urges the Scottish Government not to progress with these proposals.

## **Appendix 1: Value of students to Edinburgh**

Below is just a sample of some of the ways that students can contribute positively to the community. Through societies, charity work and representing the students' association on Neighbourhood Partnerships students at Edinburgh University have been involved in many examples of community work.

### **Students' economic contribution to the community**

Looking beyond Edinburgh, a study assessing the economic impact of students in Manchester showed that they are responsible for generating £1 billion to support businesses and jobs across the region. The study looked at money students spent on accommodation, shops, bars, cinemas and other services and found that they supported more than 15,000 jobs and spent an average of almost £15,000 over the full length of their studies.<sup>3</sup>

Another study looking at the impact of Cardiff University on the local and regional economy shows that it is responsible for generating a gross local output of approximately £100 million a year and sustaining over 3,000 jobs.<sup>4</sup>

### **Student City Forum**

Edinburgh University Students' Associations established a Student City Forum in 2007 to discuss where students and the community can co-operate and work better together in the future. This forum brought together MSPs, Councillors, letting agents, Lothians and Borders Police and representatives from council services.

### **Neighbourhood Partnerships**

Members of Edinburgh University Students' Association sit on Neighbourhood Partnerships across the city to represent student interests in the community.

### **Charities' Week**

Students raised £16,000 during Charities' Week in 2007, a weeklong programme of student-run society events to raise money for charities. This has been an Edinburgh University tradition since 1867, with Edinburgh running the first ever RAG week (Raise and Give) week which now runs in universities and colleges across the UK.

### **Societies**

At Edinburgh University we have more than 200 student-run societies, many of which contribute to the local community as well as countless charitable societies. Many examples of active and positive student involvement in the community can

---

<sup>3</sup> Study commissioned by the University of Manchester and carried out by consultants AD Little, 2008

<sup>4</sup> *The economic impact of Cardiff University: Innovation, learning and job generation*, Springer Netherlands, 2004

be found by examining the activities of these numerous student societies that contribute on a voluntary basis. Children's Holiday Venture works with children from deprived areas of Edinburgh, taking them swimming, to residential camps or outdoor activities, in order to give them a break from their home environment. Student Community Action runs one off and regular volunteering projects within Edinburgh to improve relations between the student and local community. A student-run counselling service is provided by Nightline to students at university and college across the city. The Edinburgh Group is a professional student society that provides consulting services for non-profit organisations in the local community. Dirty Weekenders carry out regular conservation work in the local area. Many students involved in the Duke of Edinburgh Award undertake community service such as working with children with additional support needs or working in charity shops. As well as the above many students are involved in Barnardo's, Shelter and Oxfam societies. There are other examples of student societies that make positive contributions to the community and these can be found on the Students' Association website at [www.eusa.ed.ac.uk](http://www.eusa.ed.ac.uk)

## **Contact**

If you have any questions regarding this response please contact Josh MacAlister, President, Edinburgh University Students' Association, at [president@eusa.ed.ac.uk](mailto:president@eusa.ed.ac.uk) or telephone 0131 650 2656.



Edinburgh University Students' Association is a charitable body, registered in Scotland, with registration number SC015800.