



# **Coventry City Council**

## **Homes in Multiple Occupation (HMO)**

## **Development Plan Document (DPD)**

### **Regulation 18: Consultation Statement**

March 2023

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## 1. Introduction

1.1 The Council is in the process of preparing a Homes in Multiple Occupation (HMO) Development Plan Document (DPD). As part of this process, the Council undertook a consultation on the draft DPD from 20 September 2022 until 15 November 2022 in accordance with Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012.

1.2 The purpose of this consultation statement is to set out how the Council undertook this consultation and the findings that emerged from it. The following document summarises how the Council consulted, who was invited to make representations, the comments that were received and how we have responded to these in the Draft HMO DPD (submission version).

1.3 The Council received 53 separate responses resulting in 190 individual representations during the Regulation 18 consultation. This statement summaries the main comments received and the Council response to them. It identifies what consultation was undertaken, when, with whom and how it has influenced the submission version of the plan (Regulation 19).

1.4 This report has been produced in accordance with Town and Country Planning (Local Development) (England) Regulations 2012 (Clause 22) (1)(c)(i-iv). This states that a Consultation Statement has to be produced to show:

- Which bodies and persons were invited to make representations under Regulation 18;
- How those bodies and persons were invited to make representations under Regulation 18;
- A summary of the main issues raised by the representations made pursuant to Regulation 18; and
- How any representations made pursuant to regulation 18 have been taken into account.

1.5 The Consultation Statement will assist the Inspector at the Examination in determining whether the Council's DPD complies with the requirements for public participation and government guidance. The report shows that the consultation carried out by the Council has complied with the statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). The report also shows that public

Homes in Multiple Occupation (HMO) Development Plan Document  
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involvement was carried out following the approach set out in the Councils Statement of Community Involvement (SCI)<sup>1</sup>.

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<sup>1</sup> [https://www.coventry.gov.uk/downloads/file/37080/statement\\_of\\_community\\_involvement\\_july\\_2021](https://www.coventry.gov.uk/downloads/file/37080/statement_of_community_involvement_july_2021)

## 2. Consultation Approach

2.1 There is considerable flexibility open to Local Planning Authorities in how they carry out the initial stages of plan production, provided they comply with the specific requirements in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, in respect of consultation, and with the commitments made within the Councils Statement of Community Involvement (SCI).

### Promotion of the consultation

2.2 Consultation on the HMO DPD (Regulation 18) document took place between 20 September 2022 until 15 November 2022.

2.3 The Regulation 18 consultation was promoted through a variety of means. These included:

- Formal notifications of the consultation were sent via the Councils consultation management system to the specific and general consultation bodies set out in the SCI as well as other individuals and organisations on the Councils Local Plan consultee database that requested to be notified.
- The Councils Planning Policy webpage was used to the draft Local Plan Reg 18 consultation event. This gave people access to information on the consultation as well as the Reg 18 draft HMO DPD and the supporting documentation.
- The HMO DPD and supporting documents were made available online and in hard copy at the Council House and public libraries. Libraries have specific facilities to enable disabled users to access the consultation material including large print screens.
- Statutory notices were placed in the Coventry Telegraph newspaper on 29 September 2022 (see Appendix 1).
- Media press release occurred in the local news on 23 September 2022 and on the Councils website homepage and ‘Lets Talk’ website homepage.
- Public notices were distributed across the city to raise awareness of the DPD and consultation.
- A summary leaflet was made available at libraries, Council offices and the consultation events. This leaflet set out the main themes of the HMO DPD and encouraged people to have their say on the plan and indicated how they could find out more and have their say. (see Appendix 2).
- Social media was also used extensively (see Appendix 4) which included:

## Homes in Multiple Occupation (HMO) Development Plan Document

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- 5 separate tweets and Facebook posts on the Council's official social media accounts during the consultation period;
- A bespoke post on the Council's YouTube channel which generated 507 views - <https://www.youtube.com/watch?v=ayTKcgwA5Hc>

 Coventry City Council ✅ @coventrycc · 23 Sep 2022 ...  
You can have your say on our proposals for changes to HMO (Houses in Multiple Occupancy) planning policy and the introduction of an Article 4 Direction by heading to your local library to let us know what you think:  
[orlo.uk/cJaDj](http://orlo.uk/cJaDj)



111 3 5 1

 Coventry City Council ✅ @coventrycc · 26 Sep 2022 ...  
Public Consultation on our proposals for changes to HMO (Houses in Multiple Occupancy) planning policy and the introduction of an Article 4 Direction has started and is from 20 Sept - 15 Nov.  
  
Visit one of your local libraries & have your say:  
[orlo.uk/ToYJ9](http://orlo.uk/ToYJ9)



111 3 2 2 1

# Homes in Multiple Occupation (HMO) Development Plan Document

## Regulation 18 – Consultation Statement

 Coventry City Council ✅ @coventrycc · 29 Sep 2022 ...  
Your voice matters.

As part of our Public Consultation process, we want to hear from residents to understand their thoughts on our Article 4 and planning policy proposals.

Want to get involved? Visit one of our drop-in sessions:[orlo.uk/planning\\_consul...](http://orlo.uk/planning_consul...)



ALT

More options: ⚡ 💬 ↗️ ❤️ 🔍

 Coventry City Council ✅ @coventrycc · 30 Sep 2022 ...  
We're hosting drop-in sessions over the next few weeks to hear your thoughts, ideas & concerns on our Article 4 & planning policy proposals as part of our Public Consultation, which is now live.

The next drop-in session is on Oct 1.

Find out more: [orlo.uk/4suw3](http://orlo.uk/4suw3)



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More options: ⚡ 💬 ↗️ ❤️ 🔍

### **Consultation events and Hard to Reach Groups**

2.4 A comprehensive round of drop sessions were carried out across several public libraries which involved officers answering questions and making available the draft DPD and supporting documents to anyone who attended. These included the following events:

<b>Location</b>	<b>Date and Time</b>
Hillfields Library	27 September 2022, 10am – 12noon
Stoke Library	27 September 2022, 1pm – 3pm
Earlsdon Caranagie Community Library	1 October 2022, 10.30am - 12.30pm
Allesley Park Library	1 October 2022, 2pm - 4pm
Aldermoor Library	4 October 2022, 11am - 1pm
Finham Library	4 October 2022, 2.30pm - 4.30pm
Canley Library	7 October 2022, 10am – 12noon
Central Library	8 October 2022, 1pm - 3pm
Cheylesmore Library	11 October 2022, 9:45am – 11:45am
Jubilee Crescent Library	11 October 2022, 2pm - 4pm
Coundon Library	14 October 2022, 11am - 1pm

2.5 In addition, targeted sessions were organised with hard to reach groups such as asylum seekers, migrants and refugees who were considered to represent a hard to reach group whom the draft DPD may affect. In line with the expectations set out in the SCI, contact was made with the Coventry Council's Migration enabling contact with forums and groups who would be able to help facilitate engagement with the identified hard to reach groups.

2.6 Contact was made with the numerous groups (106) and forums provided by the Councils migration team. Engagement was made with three specific groups and officers attended events/workshops in which the consultation could be discussed and for more information provided to those in attendance. This included the Coventry Refugee and Migrant Centre, Inini Peer Support Group and Carriers of Hope Coventry and the Landlords Forum. Leaflets were left with attendees once the event had taken place.

### **Feedback**

2.7 Any comments could be provided through a number of means including:

- Comments forms (available both online and hard copy versions).
- Comments could be made online via Inovem<sup>2</sup>, the Councils consultation system which allowed people the time to consider what they wanted to say in their own time.
- Submission of letters and emails.

2.8 A copy of the comments form is contained in Appendix 3.

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<sup>2</sup> <https://coventrycitycouncil.inconsult.uk/HMO/consultationHome>

### **3. Responses to the Consultation**

3.1 As a result of the methods outlined in Section 2, 53 responses were received which resulted in 190 representations during the consultation.

3.2 Comments were received from a wide range of people and organisations including statutory consultees, special interest groups, neighbourhood planning groups and individual residents. Organisations concerned with HMOs were represented, as were resident groups.

3.3 From the various library drop-in sessions and online meetings with local community groups, many issues were raised and can be summarised as follows:

#### **I. Drop in sessions and other engagement work:**

- Reduced social cohesion resulting from the short-term nature of residencies involved with HMOs which may involve younger people overall resulting in a demographic imbalance.
- Reduced housing choice resulting from housing type/tenure imbalance (e.g. a shift from permanent family housing to more transient accommodation);
- Reduced community engagement from residents resulting from an increase in the transient population of an area;
- Noise and disturbance resulting from intensification of the residential use and/or the constantly changing nature of households;
- Overlooking and loss of privacy resulting from poorly considered internal layouts and intensification of use;
- Detriment to visual amenity resulting from poor waste management, poor property maintenance, accumulative external alterations to properties and use of frontage areas for off-street parking;
- Reduced community services resulting from a shift in the retail/business offer towards a narrower demographic such as the proliferation of Hot Food Takeaways; and
- Highway safety concerns resulting from congested on-street parking and poor waste management.

#### **II. Hard to reach groups:**

As previously mentioned, Council officers attended 3 separate meetings where specific engagement was sought with suggested local hard to reach groups, and the main points raised are as follows:

*The Coventry Refugee and Migrant Centre*

Key points raised included:

- focusing on the fact that any actions taken to limit HMO numbers in the city would have an effect on the hard to reach groups identified.

*Inini Peer Support Group:*

- The group seeks to support people from Black and Asian Minority Ethnic groups, those seeking asylum and refugees with integration. Not all questions raised were of direct relevance to the consultation, with many of the questions concerned with wider issues across the Council of which other services would be responsible for, for example questions around the quality of parks in the city.
- Alleviating the need for HMOs for Migrants, Asylum seeker and refugees by developing accommodation specifically for them in a similar vein to that of Purpose Built Student Accommodation.
- Designating certain areas (those in proximity to the University/City Centre) solely for HMO development in order to contain them in a controlled area, preventing the identified issues from spilling into other areas.

*Carriers of Hope Coventry:*

- An organisation active in supporting refugees, asylum seekers and other migrants.
- Broadly supportive of the intentions underpinning the introduction of the article 4 direction and associated DPD.
- In particular the opportunity to see areas with some of the problems associated with HMOs was welcomed, as was the potential for less pressure on existing housing stocks being eroded away from family dwellings to HMOs.

## **Overall results**

3.4 Overall, there were 190 comments received during the consultation via the Councils consultation management system<sup>3</sup>. A summary of the main issues raised included the following:

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<sup>3</sup> <https://coventrycitycouncil.inconsult.uk/HMO/consultationHome>

**III. Significant support for the four policies:**

Respondents expressed support for the policies (either in whole or in part) and the plan objectives. Notable policies attracting support included HMO1 – Homes in Multiple Occupation, HMO3 – Sandwiching and HMO4 – Amenity and Design.

**IV. Mixture of support and objection to the concentration and threshold policy approach:**

- Whist many expressed support, some respondents wanted to see lower and higher concentration thresholds expressed in policy HMO2 – concentrations and thresholds both in terms of distance and concentration thresholds in certain wards, particularly near the University of Warwick.

**V. Objection to the proposed assessment process:**

- Several respondents objected to para 6.4 and felt this represented a 'defeatist' approach by allowing applicants to circumvent the policies and that the wording was too loose and open to interpretation.

3.5 The Council also published a Sustainability Appraisal (SA) Scoping report and an Equalities/Health Impact Assessment (EqIA) report alongside the HMO DPD policy document, with both documents available for public comment. Comments were received in respect of the SA Scoping report from the statutory consultees only and no comments were received in respect of the EqIA report.

**Option Selection**

3.6 The key issues raised by respondents to the consultation are summarised in table 1 below. A comprehensive capture of all respondent comments can be found in Appendix 5.

Table 1: Key Issues

<b>Respondent comments – summary of key issues</b>	<b>Officer response</b>
<b>General</b>	
- How are the number of HMOs calculated?	The number and distribution of existing HMOs is made through the following data sources:

	<ul style="list-style-type: none"> <li>• Council tax records – properties with student exemptions (excluding purpose built student accommodation and self-contained flats).</li> <li>• Licensing records – properties licensed as an HMO.</li> <li>• Planning records – properties with C4 or Sui Generis planning consent or issued with a Certificate of Lawful Development.</li> </ul>
<b>HMO1: Homes in Multiple Occupation</b>	
<ul style="list-style-type: none"> <li>- The policy proposals set out in Draft Policy HM01 are supported.</li> <li>- Increase in HMOs has led to an increase in vehicular parking and elderly individuals feeling isolated and lonely.</li> <li>- Waste left on the public highways and noise being an issue at certain times of the day for existing residents.</li> <li>- Huge changes to the appearance and feel of the areas that they live.</li> </ul>	<p>Policy HMO1, in conjunction with the other policies contained within the DPD and existing adopted Local Plan policies will be used to assess all future prospective HMO planning applications which, will give the Council greater control in terms of how HMOs are managed through the planning system. General support noted and welcome.</p>
<b>HMO2: Concentrations and Thresholds</b>	
<ul style="list-style-type: none"> <li>- General support for the policy.</li> <li>- Concentrations are already exceeding 10% and the 100m distance threshold is generally supported.</li> <li>- Lower and higher concentrations need to be considered both in terms of distance and concentration thresholds in certain wards, particularly near the University of Warwick.</li> </ul>	<p>The suggestion to use different figures for the concentration and distance thresholds were tested through the Sustainability Appraisal process (please refer to SA report). On balance, and based on the SA testing, it is considered to keep the figures as put forward in the Regulation 18 as they are robust and tested through a Local Plan Examination process in other comparable cities. The Council are unable to apply these policies retrospectively so will only be applied if and when the DPD is adopted. Support noted and welcome.</p>
<b>HMO3: Sandwiching</b>	
<ul style="list-style-type: none"> <li>- General support for the policy.</li> <li>- Sandwiching only relevant to high density areas and consideration should be given to lower density areas.</li> </ul>	<p>Given the city is a predominately high density area, it is considered that policy HMO3 holds good as set out in the Regulation 18 document. Support noted and welcome.</p>
<b>HMO4: Amenity and Design</b>	
<ul style="list-style-type: none"> <li>- General support for the policy.</li> <li>- Need to make specific reference to 'Secured By Design' standards.</li> <li>- Character of the neighbourhood can change due to HMO</li> </ul>	<p>It is acknowledged that reference to 'Secured By Design' standards in policy HMO4 would be beneficial and so a proposed change to policy HMO4 and reasoned justification has been made. The Council are unable to apply these policies</p>

increases by way of increased vehicular parking on street and also green space provision should be insisted when HMO applications are made.	retrospectively but will use existing policy mechanisms through the Local Plan and Green Space Strategy to address green space matters. If and when the DPD is adopted, the policies will then be used to determine all future HMO planning applications. In any event, the reference to vehicular parking is already addressed through point e) of the policy. Support noted and welcome.
<b>Assessment Process</b>	
<ul style="list-style-type: none"><li>- General support to the approach.</li><li>- Para 6.4 is effectively 'throwing the towel in' and is totally unacceptable.</li><li>- Para 6.4 wording is far too loose and open to interpretation. Even where the existing HMO concentration is high, each and every new proposal must be subjected to rigorous planning scrutiny and the views of local residents must be taken into account.</li></ul>	Agreed to delete para 6.4 as on balance, the para does not provide added value to the way in which HMO applications will be assessed through the planning application process.

## **Appendix 1- Statutory notice**

[facebook.com/coventrytelegraph](https://facebook.com/coventrytelegraph)

THURSDAY, SEPTEMBER 29, 2022 COVENTRY TELEGRAPH 39

## Appendix 2 – Summary leaflet

# Homes in Multiple Occupation Consultations. *Have your say!*

20 SEPTEMBER 2022 – 15 NOVEMBER 2022

A Home in Multiple Occupation (HMO) is defined as a property rented to at least three people who are not from one 'household' (e.g., a family) but share facilities such as a bathroom and kitchen. HMOs meet a variety of needs for private rented housing, ranging from young professional 'house-shares' and students wanting to live off campus, as well as providing a vital source of housing supply for people on lower incomes as well as a range of other reasons. For many people, HMOs provide a practical and affordable housing option that meets their housing needs. They provide an important contribution to peoples' housing choice.

- With the city's growing population, there is a need to ensure that new development supports thriving communities by ensuring the right mix of housing types in a neighbourhood, securing appropriate design, and supporting well managed properties. Some HMOs are purpose-built, e.g., student accommodation, but many are created through the conversion of buildings. Within areas of Coventry where there are a lot of HMOs there are increasing concerns about the changing nature of communities and neighbourhoods, and the impact of this change.
- Coventry City Council is looking at introducing some new planning policies which will be used to help decide whether planning applications for HMOs in Coventry are acceptable or not. The policies focus upon issues such as the need for a range of different housing options to serve the community, matters relating to maintaining positive residential environments, and acceptable parking standards to ensure that new HMO developments do not have a negative impact on the surrounding areas. It is the aim of the policy document to ensure that potentially harmful concentrations of HMOs do not arise and that a high standard of accommodation is delivered and maintained.
- However, while this new policy document sets our views on a potential preferred approach, we are seeking views and any input on any alternative approaches that you may want to put forward and what evidence we should consider to support this.
- In conjunction with the Development Plan Document, Coventry City Council will be introducing an 'Article 4 Direction'. Currently, under 'Permitted Development' rules, planning permission is not required for the change of use of a family dwelling to a small HMO (less than 6 unrelated occupants in a single dwelling). The introduction of an Article 4 Direction will withdraw these permitted development rights, so planning permission will need to be obtained before the use can be changed. The Article 4 Direction will apply to eleven wards in Coventry which have been identified as having especially high concentrations of HMOs already, so the impacts of further changes would need to be very carefully considered to assess whether or not this might negatively affect the surrounding area.

Consultations are now under way, and we want to hear from you! Comments can be provided through the consultation platform, accessed via the following link or you can use our comments form  
[www.coventry.gov.uk/planning-policy/planning-policy-consultations](http://www.coventry.gov.uk/planning-policy/planning-policy-consultations)

Handwritten forms can be scanned and emailed to us at [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk), alternatively, they can be posted (addressed to the Planning Policy Team) to PO Box 15, Council House, Earl Street, Coventry, CV15RR.  
The deadline date for representations to be submitted is 15/11/2022.

# FAQ

## ● What type of policies will the document contain?

The four draft policies address the key issues that have been raised which will be used when considering HMO planning applications.

## ● Can we still convert houses into HMO's?

Once the new rules are adopted you may need to submit a planning application to change a house into a HMO – this will be the only way can convert a house to a HMO in the 11 wards to which the Article 4 will apply.

## ● How will HMO applications be assessed?

They will continue to be assessed against the policy in the adopted Coventry Local Plan and once adopted, the policies in the HMO DPD. As with all planning applications, other factors will be considered alongside relevant policies.

## ● What areas will this affect?

The Article 4 Direction will apply to the 11 specific Coventry wards only (Cheylesmore, Earlsdon, Foleshill, Lower Stoke, Radford, St. Michaels, Sherbourne, Wainbody, Whoberley, Westwood and Upper Stoke). The policies in the DPD will be applied and used to assess all HMO planning applications across the city.

## ● What will happen to existing HMOs?

The Article 4 Direction will not be applied retrospectively once it comes into force (expected autumn 2023) so any lawful HMOs operating within the 11 specified wards will not need to apply for planning permission.

## ● Do these policies still affect areas outside the areas listed?

Yes – the HMO DPD policies will apply to HMO planning applications across the city.

## ● Will this affect landlords of HMOs?

Yes – once the Article 4 comes into force, all landlords in the affected wards will have to apply for planning permission if they want to create a new HMO.

## ● If a house is already a HMO can it be converted back to a residential home?

Yes of course however, it may still require planning permission.

## ● Will Purpose Built Student Accommodations be affected?

No – the Article 4 Direction and HMO DPD relate specifically to HMO proposals. Purpose Built Student Accommodation will continue to be considered against the policy in the adopted Coventry Local Plan.

## ● When will this policy be introduced?

The HMO DPD is currently expected to be adopted in autumn 2023. The Article 4 direction is to be introduced as a non-immediate direction; it is expected to be in place by autumn 2023.



## Appendix 3 – Comments form

### Comments Form – Homes in Multiple Occupancy Development Plan Document and Supporting Documents

Comment is now being sought in relation to the Homes in Multiple Occupancy Development Plan Document, Regulation 18: Issues and Preferred Option Consultation Document and associated supporting documents. Please use the form attached to share your comments. Completed forms should be scanned and sent to [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk), alternatively, completed forms can be posted (addressed to the Planning Policy Team) to PO Box 15, Council House, Earl Street, Coventry, CV1 5RR. The deadline for submissions is 15<sup>th</sup> November 2022.

You should be aware that all submitted information including your name and your comments will be publicly available. Other personal details e.g. private address and email will be kept confidential. For further information please read our privacy statement <https://www.coventry.gov.uk/planning-policy/planning-policy-privacy-notice>

Name:.....  
.....

Address:.....  
.....  
.....

Representing (If Applicable):  
.....  
.....  
.....

Email (Optional):  
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Would you like us to add your email to our consultation database, so you are aware of updates and other planning consultations. (Please tick yes if you consent to us adding your details).

Yes

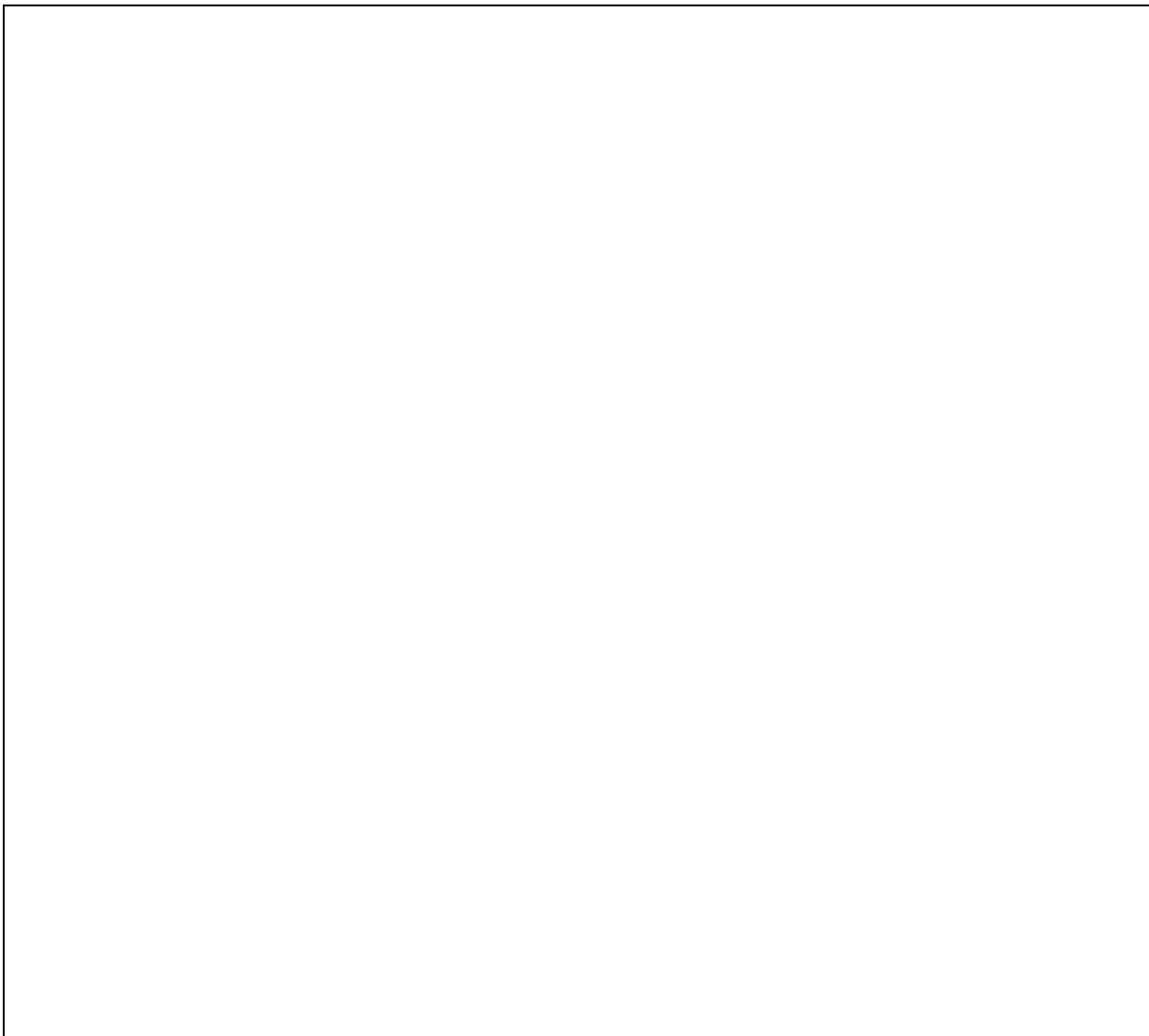
**Which document are you commenting on (please tick).**

Development Plan Document

The Article 4 Direction

Equality Impact Assessment

Sustainability Appraisal and Habitats Regulations Assessment Screening

A large, empty rectangular box with a thin black border, occupying most of the page below the document title and questions. It is intended for respondents to write their comments or answers.

## Appendix 4 – Social media analytic report

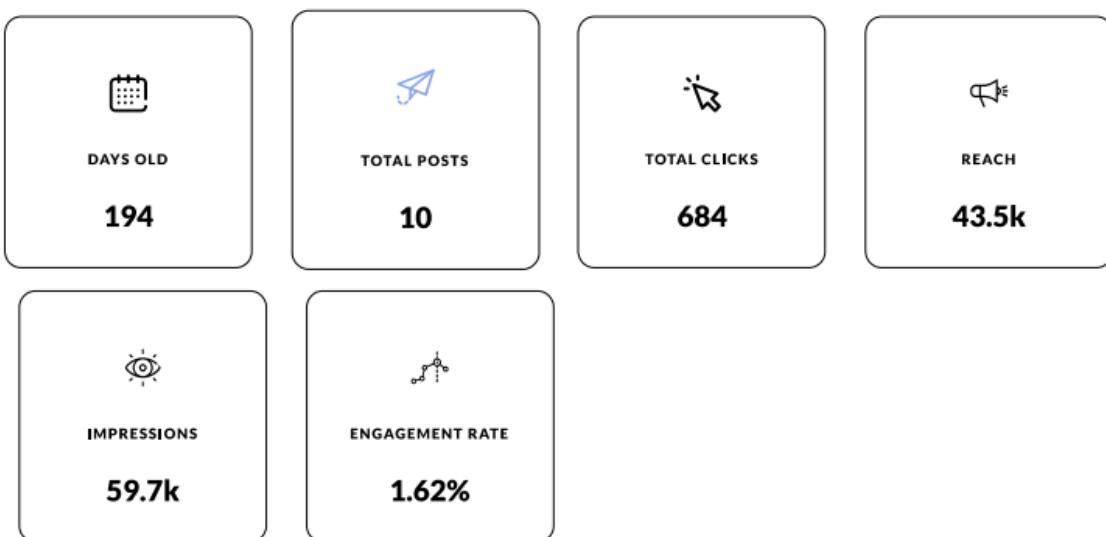
CAMPAIGN REPORT

1 Jul 22 - 11 Jan 23 HMO DPD/A4D



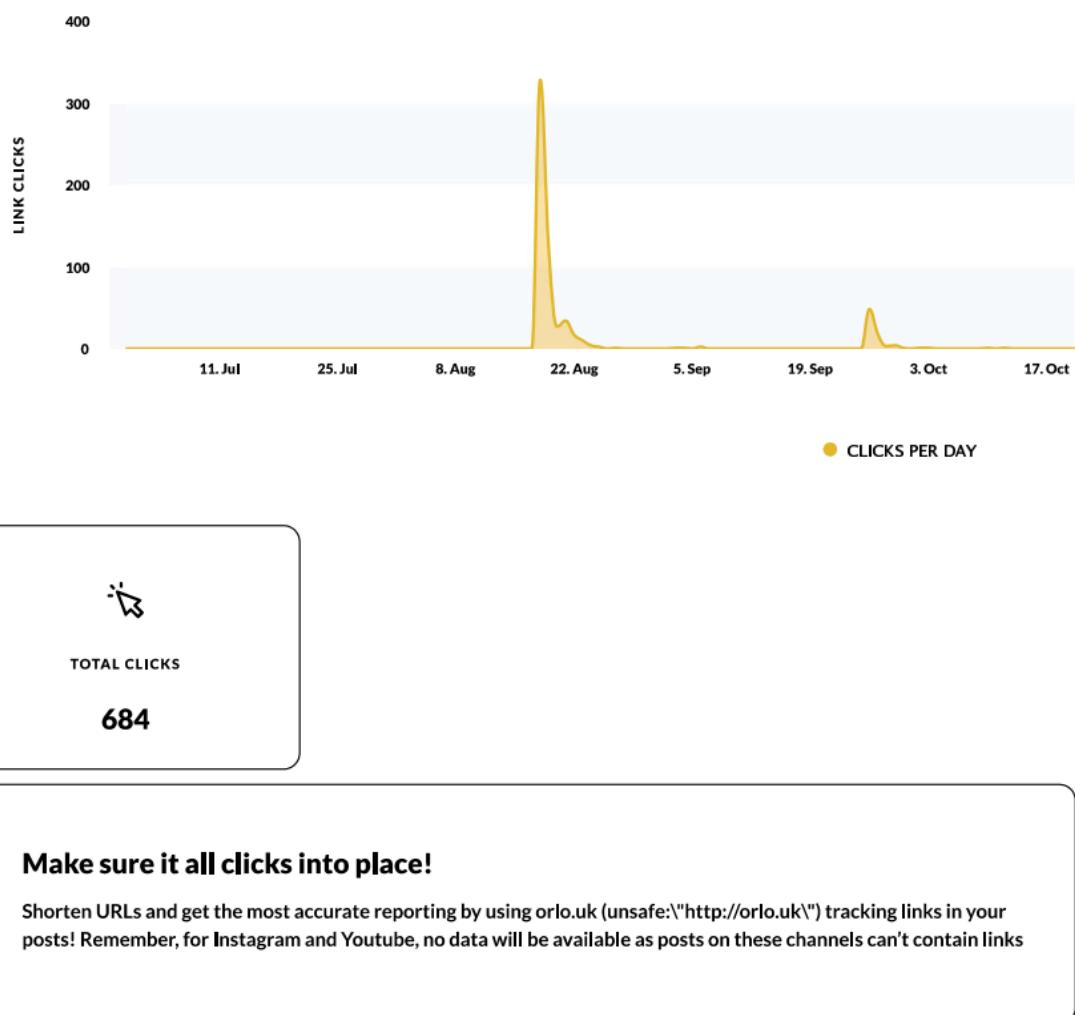
### Overview

ALL NETWORKS TWITTER FACEBOOK

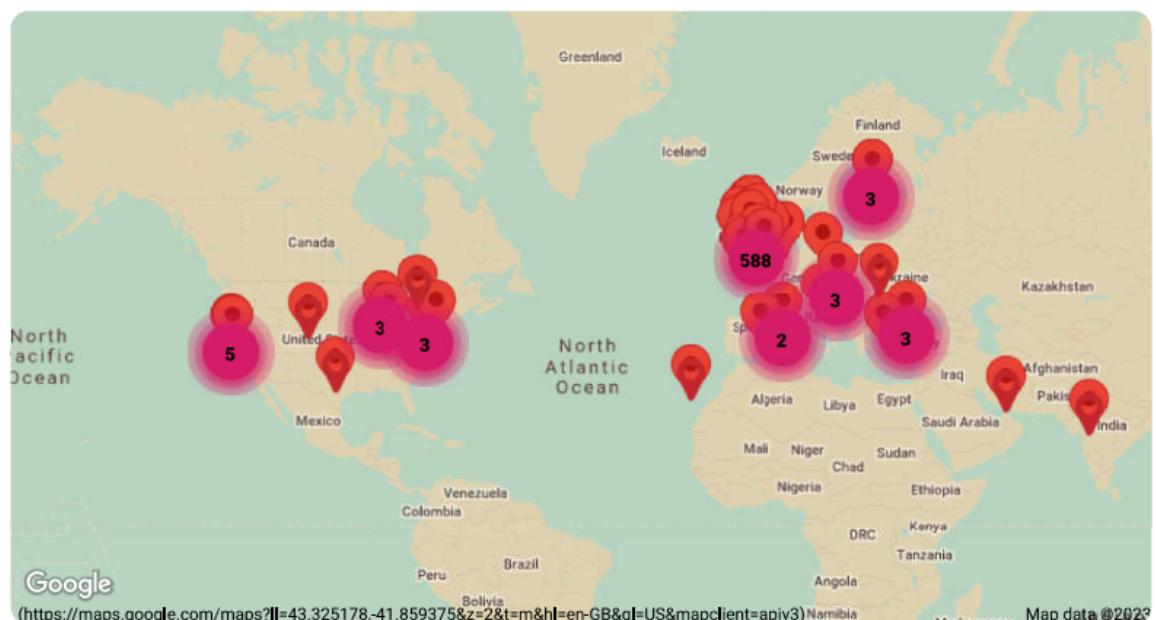


### Link clicks

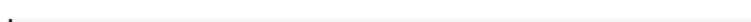
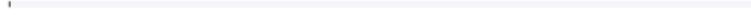
ALL NETWORKS TWITTER FACEBOOK INSTAGRAM LINKEDIN YOUTUBE



#### Global Link Clicks (?)



**Locations**

<b>United Kingdom</b>	<b>647</b>	
<b>United States</b>	<b>13</b>	
<b>Spain</b>	<b>3</b>	
<b>Finland</b>	<b>3</b>	
<b>Hong Kong</b>	<b>3</b>	
<b>Ireland</b>	<b>2</b>	
<b>Netherlands</b>	<b>2</b>	
<b>Turkey</b>	<b>2</b>	
<b>United Arab Emirates</b>	<b>1</b>	
<b>Canada</b>	<b>1</b>	
<b>Cyprus</b>	<b>1</b>	
<b>Germany</b>	<b>1</b>	
<b>Hungary</b>	<b>1</b>	
<b>India</b>	<b>1</b>	
<b>Italy</b>	<b>1</b>	
<b>Romania</b>	<b>1</b>	
<b>Sweden</b>	<b>1</b>	

**Posts breakdown**

**Posts by Network**

 **Facebook**  
TOTAL REACH



**43.5k**



TOTAL COMMENTS

**65**



FROM CUSTOMERS

**74**



TOTAL LIKES

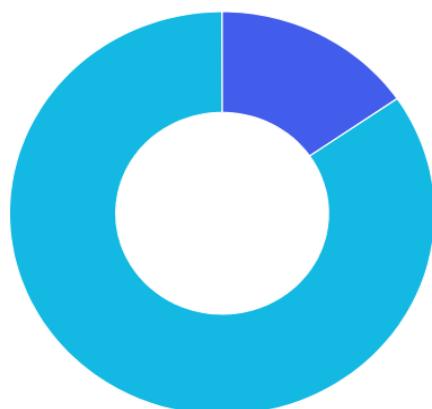
**158**



SHARES / RETWEETS

**59**

**Inbound Comments**



● 10 | Twitter

● 55 | Facebook

## Top Posts

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18 Aug

coventrycc f 2022 |

12:46



In early September, we'll  
be holding a public...

 91

 27.7K



 32

 28.6K

 40

 2.36

 512

512

CLICKS

[View post](#)

26 Sep

coventrycc w 2022 |

11:02



Public Consultation on  
our proposals for...

 2

 1.7K



 2

 2.84

 3

 40

40

CLICKS

# Homes in Multiple Occupation (HMO) Development Plan Document

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coventrycc 2022 | 12:46  In early September, we'll be holding a public... 4 likes 1 comment 37 shares 37 clicks

View post  26 Sep 2022 | 11:02  Public Consultation on our proposals for... 5 likes 3 comments 2.08 shares

View post  11 Nov 2022 | 13:00  We want to hear your thoughts, ideas and... 0 likes 0 comments 17 shares

View post  07 Nov 2022 | 11:00  Your voice matters. As part of our public... 2 likes 3 comments 1.28 shares

View post  11 Nov 2022 | 13:00  We want to hear your thoughts, ideas and... 0 likes 0 comments 15 shares

View post  07 Nov 2022 | 11:00  1 like 0 comments 617 shares

## **Appendix 5 – Regulation 18 responses report**

## Houses in Multiple Occupation DPD - Regulation 18 Consultation Statement

Report of representations received

Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
HMO/56	Madelein Struthers				<p>The clustering/dots used here is totally inappropriate and gives no indication of the true situation on Cannon Park estate.</p> <p>In the 134 property Greens there would be 107 dots very close together. Better use of magnification is seen on page 43, Figure 23 of the CCC Supporting document.</p>	15	Evidence base Object
HMO/101	Mrs Debbie Williams				<p>This is a good indication of how densely populated the area around Cannon Park shops and along charter avenue is with existing HiMOs. Already far too many. Plus new student accomodation blocks are being built near the Tesco shopping centre, within Canley and on Westwood Business Park so there should be less demand for student HiMOs rather than more. Hopefully some of the exisiting HiMOs could be turned back into family homes.</p>	4	Evidence base Support
HMO/115	Mr David Swanson				<p>The identification of current HMOs as red dots on the map inadequately captures and reflects the concentration of HMOs across the local community, in part due to the inappropriate scale used to represent the entire city on one map. If maps ere presented covering each ward, it would be easier to fully</p>	14	Evidence base Object

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					understand the number of HMOs in each community. From inspection of the map as presented, I believe that the number of HMOs in the Cannon Park Estate/Cannon Hill Road community is significantly understated, possible due to missing data such as unlicensed HMOs.		
HMO/160	Philip Cowen				The extent of HMO conversion of roads such as Charter Avenue is extreme. Driving along the road I have seen houses almost completely demolished to be re-built from the ground up. Surely this should not be allowed and the fabric of existing buildings should be retained if conversions to HMOs go ahead.	13	Amenity Own experience
HMO/180	Mr David Cass				The scale of the plan is far too small and needs to be enlarged so that each HMO (which is represented by a red dot) can be specifically identified.	10	Evidence base Object
HMO/190	Mrs Jillian Cass				Comment – The scale of the plan is far too small and needs to be enlarged so that each HMO (which is represented by a red dot) can be specifically identified.	10	Evidence base Object
HMO/14	Leah Tardivel				What will happen with existing HMO's where they're already	2	Object Policy HMO1 Homes in

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					causing issues?		Multiple Occupation
HMO/27	None (Ms Janet Dixon)			None	The preferred approach looks a good way forward .	2	Policy HMO1 Homes in Multiple Occupation Support
HMO/37	Mr Keith Struthers				At 40%, has a harmful concentration of HMOs already occurred in the Cannon Park estate?  CCC needs to address that, and come up with actions that protect remaining home owning Council Tax paying residents. In addition for consideration of introduction of Article 4 Direction, current restrictions in Cannon Park of enforceable double and single yellow lines must be maintained in perpetuity to protect what remains of the social fabric of the Estate.	5	A4D Miscellaneous Policy HMO2 Concentrations and Thresholds Support
HMO/47	Madelein Struthers				In Cannon Park Estate, harmful concentrations have already arisen with elderly individual isolated and lonely. This should never have been allowed to occur.  Article 4 Direction must be introduced to gain further control of the process, which is already weak.	6	A4D Miscellaneous

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HMO/66	Mr Jon Hodge				Waste Management and Parking are key considerations. We are in a restricted residents parking zone, which means parking has to be on driveways meaning there is typically a maximum of 2 cars that can be managed sensibly for each property	1	Amenity Own experience Policy HMO1 Homes in Multiple Occupation Support
HMO/67	Mr Jon Hodge				Waste Management and Parking are key considerations. We are in a restricted residents parking zone, which means parking has to be on driveways meaning there is typically a maximum of 2 cars that can be managed sensibly for each property	2	Amenity Own experience Policy HMO1 Homes in Multiple Occupation Support
HMO/106	Mr David Swanson				The policy proposals set out in Draft Policy HM01 are supported. Point (c) is particularly important as it has been failure to consider these aspects consistently in the local community that has resulted in the current over intensification of HMOs in the Cannon Park Estate and is starting to be evident in the Cannon Hill Road localities.	5	Policy HMO1 Homes in Multiple Occupation Support
HMO/138	Bevcor Group Ltd (Mr Robert Corrigan)			Bevcor Group Ltd	We have lived in the southern tip of the Canley Conservation Area for the past 15 years. We are immediately adjacent to the housing most greatly affected over that time regarding the	1	Policy HMO1 Homes in Multiple Occupation Support

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					<p>conversion to HMOs in the Canley / Cannon Park area. We are completely in support of the Article 4 Direction policy and its attempt to better regulate HMOs, in the name of improving the quality of life for existing and future homeowners in our neighbourhood.</p> <p>The advent of the HMOs in our area we understand to be down to the rapid expansion of the student population at the University of Warwick. We are not members of the university community, but overall we are extremely supportive of the university. We also understand the importance of the University of Warwick, not to mention Coventry University, for the economic well-being of Coventry.</p> <p>However, we have been greatly dismayed over the years to watch the quality and upkeep of the housing in the neighbourhood decline substantially, almost all due to the HMOs. A 10 minute walk around our neighbourhood provides proof certain that the absentee landlords of many HMOs have little interest in the physical appearance of their properties, and willfully neglect their upkeep. For example, where there were flourishing flowerbeds in years past, there are weeds and often overgrown grass uncut for months or even a year. Much of the fencing is in horrific condition. Once refurbishment is done, construction materials often lie about the site haphazardly for weeks, months and years. We also have strong reason to believe, from conversations with builders, that the representations made by HMO owners /</p>		

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					<p>landlords to the Council often have false information in them to disguise the nature of their HMOs eg, an 'office' is really an accommodation, and a house is repurposed for eight students not five or six.</p> <p>We are hopeful that Article 4 will lead to much needed additional scrutiny and regulation of HMOs in our area and throughout the city.</p>		
HMO/151	Philip Cowen				<p>The council should set the bar high for proposals to meet the points above. We have already seen in Chapelfields around Craven Street that traffic surveys can be carried out at the most suitable times to demonstrate there is parking capacity in an area. Developers and their representatives will have no qualms about using similar tactics to demonstrate the points above. The council should have clear metrics established to determine the bar to be reached for each point.</p>	4	Key Issues Other Policy HMO1 Homes in Multiple Occupation Support Support
HMO/165	CARTA (Miss Sian Thuraisingham)			CARTA	<p>The CARTA area incorporates the Chapelfields Conservation Area. Properties are narrow terraced houses with very limited off-street parking. The existing conversions have had no regard for reasonable, safe, accessible and convenient vehicular parking. The increase in people living in a property has increased the volume of vehicles vying for parking spaces. Our area has a</p>	3	Policy HMO2 Concentrations and Thresholds Support

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					<p>thriving pub trade so in addition to issues with residents being able to park the increase in vehicles is having a detrimental impact to people being able to visit the local pubs. As a Residents' and Traders' Association we are keen to ensure that local businesses are also not impacted negatively.</p> <p>Developers are often not local and have no regard for the Conservation status and character of the area. We have had instances of changes made to properties without appropriate planning including illegal installation of external cladding to a property, this was despite a number of residents pointing out to the builders that there are additional requirements because of our conservation area status.</p>		
HMO/1	Mr Charles Barker				<p>I fully support the proposed introduction of Article 4 directions. This is overdue. The rapid growth of HMOs in my area (Lower Stoke) has already had a seriously negative effect. It has all been said before but I say it again: A large number of HMOs mean houses falling into neglect. The residents have no stake in the community, nor do the (often absentee) landlords. The fabric of what was a settled, cared-for community slowly falls apart - litter in the streets, overflowing bins, fly-tipping, shabby housing. This is happening now! Families drift away to better cared-for suburbs, their homes in turn become HMOs, and the spiral of decline continues. Instead of allowing rentiers to make money by packing people into low-quality accommodation, let's keep our houses fit</p>	1	Policy HMO1 Homes in Multiple Occupation Policy HMO4 Amenity and Design Support Support

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					<p>for families to bring up their children in safety. Let's create and maintain genuine communities for the long term - places where people know and care for each other, and their surroundings.</p> <p>Yes to Article 4 directions!</p>		
HMO/2	Rebecca Thompson				<p>Would love to see article 4 introduced. However, concerned about the length of time to become effective meaning developers could buy up stick and convert quickly. Plus what will happen to houses already converted or in the process of being that haven't had planning approval for things they need, such as velux on the front elevation? To grant retrospectively just says they can do what they want and with many having been bought by quick buy developers during covid, street scenes have changed rapidly. The developers price first time buyers out as they have cash and buy quickly.</p>	1	Policy HMO1 Homes in Multiple Occupation Support
HMO/8	National Highways (Miss Karishma Khatri)			National Highways	<p>Thank you for the opportunity to respond to the Homes in Multiple Occupation (HMO) Development Plan Document consultation. We have reviewed the associated documentation and do not consider this to be of interest to the Strategic Road Network. As such, National Highways have no further comment.</p>	1	Miscellaneous No comment

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HMO/9	Mr John Hudson				Whether this does preserve the character of neighbourhoods remains to be seen, as lack of an Article 4 directive over the best part of a decade has seen areas of our city deteriorate to a point which seems beyond reclamation. Still, it's better late than never,, even if it does seem too little too late. I look forward to a detailed plan of how these 11 wards can be regenerated into something like what they once were.	1	Policy HMO1 Homes in Multiple Occupation Support
HMO/10	Ms Janet Vaughan				I support the introduction of Article 4, because in the 25 years I have lived in Sherbourne Ward, I've seen the houses in my street gradually become HMOs to house 6 or more tenants/separate households in what were previously family homes. When we first moved in, the street was a mix of families, older couples who had been there a while and a couple of the houses were converted into two flats. There was a stability about the area as there was a pretty low turnover of residents, and there was a feeling of community and safety in those familiar faces. The street was tidy because less people generate less rubbish and there tends to be more care for the area; and the neighbours we woould recognise by sight even if we were not exactly friends. It's very different now - with at least 75% of the street HMOs, or short term rentals, almost all the front (and back) gardens are yards - so there is less greenery and less wildlife. The rain water run off is far faster and greater volume because it is running off paving rather than soaking into grass/ earth/ground, and of course there is more demand for parking etc.	1	Amenity General Observation Own experience Policy HMO1 Homes in Multiple Occupation Statistical evidence Support

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					<p>The number of additional toilets (most HMOs in the street seem to have en suite bathrooms for each room) adds a huge amount of additional waste into the Victorian sewers that they were not designed for, and as the inspection cover for several houses is sited in my garden, I can attest to the impact this has in terms of smell. However, perhaps the main impacts of high concentrations of HMOs are 1. High turnover of tenants means we don't know who our neighbours are, feel less safe and community becomes pretty non-existent; 2. High turnover of tenants also means that every year landlords re-fit rooms that people have vacated which generates an enormous amount of waste on top of the waste tenants leave; 3. Multiple wheelie bins are needed for each HMO, which means the pavement is very difficult to navigate, bins are continually overflowing because landlords/ short term tenants do not have a good system for separating waste streams and all bins get filled with plastic bags and so are never emptied, leading to rubbish piled up and - of course - rats. I feel that the introduction of Article 4 would be a step towards mapping HMO provision across the city and enabling communities to resist additional HMOs - although I worry that there is so little community left in areas that already have areas of high HMO concentration, that this may not be a strong enough measure.</p>		
HMO/11	Stephen Child				<p>I live in canon park and moved here in July 2021. Already in only 12 months have seen HMO's created without any planning</p>	1	Amenity General Observation

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					permission and these are all for housing students. The estate is starting to look dirty and there are clusters of HMO's. This legislation is vital if we are to maintain some sense of community in our city and some balance. No one in the council can tell me what good looks like for an area for ratios of HMO's per x houses or people so no surprise it's growing uncontrollably.		
HMO/12	Miss Lucy Thorpe				I live in Cannon Park and have done for the past year (Old Mill Avenue CV4). This is an area with an extremely large number of HMOs and rising. There are 'official' HMOs with planning and then numerous other dwellings that have either been denied HMO status but are clearly operating as such, or landlord owned homes which have a high volume of student tenants. There are now whole roads which are purely made up of student housing. The area is gradually being bought up by business people who are looking to provide student accommodation for overseas students at Warwick University. The end result is that we are now in a position where the estate is becoming unkempt and pretty much an off-shoot of the uni - despite our property being valued in the region of 700K we are now living alongside residencies which are becoming in gradual disrepair with overgrown gardens and huge volumes of rubbish and numerous shopping trolleys (there were 9 alone left in the roads last Friday night on a short walk that I did with my dog on the estate). The council needs to take action to address the unsanctioned HMOs and stop these landlords from	1	Amenity Own experience Policy HMO1 Homes in Multiple Occupation Support

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					<p>buying what could become family properties. This would enable us to drive a sense of local community and also help to maintain the general upkeep of the estate. There are another two properties currently which I know of that are in the process of being converted and something needs to be done about this as a matter of urgency. I know that one was refused HMO status but is obviously being converted as such (indeed I saw students moving in there today). If I built an extension without proper planning I would be asked to take this down but it would seem that these landlords can do what ever they like and the council turns a blind eye.</p>		
HMO/18	Mrs Lynn Hnat				<p>Afternoon,</p> <p>I have petitioned the Proposed Blanket Banned HMO area for Moreall Meadows estates. I would like to proposed 10% limit for the the Moreall Meadows estate which covers Moreall Meadows, The Arboretum, Russet Grove, Cassandra Close, Poppyfield Court and Heritage Court streets. There was over 120 signatures for the banned HMO proposal that wasn't accepted. This would be the fairest way to make sure there is a very limited HMOs in this neighbourhood.</p> <p>The development area that already in used only for single household unit has already been agreed by Coventry Council regarding a restrictive covenant that has been placed on the</p>	1	Policy HMO2 Concentrations and Thresholds Support

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					<p>development area by the land deed agreement which was dated 27 March 1897 between David Wilson, developer and the private owners and Coventry Council. The tile number is WM44722. The 10% limited HMO proposal would cover Moreall Meadows, The Arboretum, Russet Grove, Cassandra Close, Poppyfield Court and Heritage Court.</p> <p>If you have any further enquiries, please do not hesitate to get in touch with me. Many thanks.</p> <p>Lynn Hnat</p> <p><a href="mailto:lynnhnat66@sky.com">lynnhnat66@sky.com</a> or <a href="mailto:lynnhnat00@gmail.com">lynnhnat00@gmail.com</a></p>		
HMO/19	Mrs Teresa Whetstone				<p>There should be greater control over the number of HMOs in residential areas.</p>	1	Policy HMO1 Homes in Multiple Occupation Policy HMO2 Concentrations and Thresholds Support Support

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HMO/33	Mr Keith Struthers				<p>Since 2008, when the University of Warwick expressed its intention to house students in neighbouring suburbs, the CP/CHR area has been increasingly targeted by developers for conversion to student HMOs. Concern was raised by CPCPA from the outset about this, and asked in 2011, for Article 4 Direction to be introduced. These please were ignored, and residents objected to many applications for HMOs of 7 or more residents, supported by Cllr Sawdon at Planning meetings. These objections were usually ignored. By 2017, it was estimated that 27% of properties in CP were HMOs; a 159 signature petition was gathered by CPCPA following a AGM. This was presented by Cllr Sawdon to CCC Cabinet, but this and a second petition were shelved for 1 year and no appropriate review took place. The HMO rate in CP is now estimated at 40%.</p> <p>In the Greens of CP, with 134 properties, essentially all HMOs of 6 or less occupants, it is estimated at the HMO rate is 80%. If Article 4 Direction had been introduced in 2011, this could have prevented the ongoing social disruption of CP in particular, and if a sensible limit had been put on these areas.</p> <p>The HMO-isation of CP/CHR area has led to an overwhelming demographic change of a previously cosmopolitan, family orientated community. Isolation and loneliness of single elderly CT paying residents is completely unacceptable; it is remaining residents who try to obviate and address these issues.</p>	1	Evidence base General Observation Object Statistical evidence

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					<p>These issues are apparently of no concern to CCC, the University or owners of HMOs.</p> <p>It is astonishing that the Iceni (the key evidence based document cited by CCC) makes no reference at all to CP/CHR area.</p>		
HMO/42	Madelein Struthers				<p>Cannon Park Estate (CPE) has been under pressure to provide HMOs for University of Warwick students since 2009. In 2013 17% of properties in CPE were HMOs, by 2017 this was 27% and 2022 the rate is estimated 40%. CCC planning committee granted many applications for HMOs of 7 or more bedrooms. In CPE local residents were very concerned about, this uncontrolled development, and also the fact that HMOs which have 6 or less bedrooms were granted.</p>	1	General Observation Statistical evidence
HMO/43	Madelein Struthers				<p>Cannon Park Estate (CPE), a residential area of 368 properties in a family orientated, cosmopolitan suburb has been under increasing pressure to provide student HMOs for University of Warwick (UoW). By 2013, 17% of properties were HMOs, this had risen to 27% by 2017 and 40% by 2022, dramatically altering the social fabric of CPE, so much so that very few local children are present to attend Cannon Park Primary School on the Estate. The local Council Tax (CT) paying home owners are increasingly older, often single retired individuals.</p>	2	General Observation Policy HMO1 Homes in Multiple Occupation Statistical evidence Support

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					<p>Through the community association (CPCA), residents felt unsupported by the Council to prevent this. Applications for HMOs of 7 or more bedrooms were readily granted by CCC Planning Committee, with total disregard of local residents. HMOs of 6 or less beds, which do not require planning permission were especially developed in the 134 property Greens, where 80% are now HMOs, an unacceptable level.</p> <p>Article 4 Direction must be introduced for CPE in order that all HMO applications require planning permission. This must be done with Planning Committee robustly enforcing, for a change, CCC planning policies and national guidance, to put a stop to the unacceptable level of HMO-isation.</p> <p>Properties for students must be built on campus where there is plenty of space</p>		
HMO/57	Mrs Diane Tolley				<p>I believe having an Article 4 in place to be excellent in fact this should have been done years ago. I have nothing against students and know that they do a lot of good in communities. I have a problem with landlords they do not look after the properties or give the students enough information about what is expected from them. I have worked in the community for over 20 years and have seen how the state of the community has deteriorated. We have a real problem with rubbish being dumped everywhere, landlords not providing enough rubbish bins and not telling students what</p>	1	Amenity Own experience Policy HMO1 Homes in Multiple Occupation Support

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					<p>goes in each bin. Students leaving windows open at night which encourages burglars and putting the rest of the community at risk. By allowing landlords to keep buying up houses prevents younger people from getting on the property ladder as this puts the price of properties out of their price range. I also believe that part of the planning application should be an agreement to install solar panels on any new properties or HMO's irrespective of whether it is a private property or housing association.</p>		
HMO/58	Mr Terry Smith				<p>Having lived in a residential street for 30 years I have seen how things have changed over the years.</p> <p>About 20 years ago there wasn't any HMO's in my street, it was clean, it was quiet &amp; it was a nice place to bring up a child.</p> <p>Gradually over time greedy landlords began to convert the lovely 100 year old houses into HMO's, overtime you start to see how much impact they can have on your area.</p> <p>The noise is completely ridiculous, no one has any pride in the property they live in &amp; leave it in a mess because none of the occupants see it as their job so clean or sort out.</p> <p>The landlords place several people in one house without any criminal background check, how on earth is that safe, especially as a tenant. You will have no say on who you share your home</p>	1	Amenity Own experience Policy HMO4 Amenity and Design Support

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					<p>with.</p> <p>A man across the road from me had lived there for roughly 15 years, then the landlord decided to add more people into the property, the man had schizophrenia &amp; was clearly mentally unstable. About 6 months later he had stabbed the other guy in the back, the back of the neck &amp; left him to bleed to death, luckily he survived but was on a life support machine for weeks, he has not been the same since. Bottom line is they are not safe. I don't understand how single young women can feel safe living with complete strangers.</p> <p>Bins are another issue, how on earth is a house with more than 3 or 4 people supposed to share 1 wheelie bin? You can see how much rubbish is all over the street that they can't fit the HMO's shared bins.</p> <p>On top of HMO's there is Student accommodation in the street, there is hundreds &amp; hundreds of people living in one small road, it's unbearable to live here.</p> <p>My son has autism &amp; really struggles with the noise here.</p> <p>There really is no thought about family's anymore. We don't feel safe because of it.</p> <p>It is all a case of greed, turning family homes into separate rooms</p>		

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					<p>in order to charge more rent per calander month.</p> <p>Where are families supposed to live these days?</p>		
HMO/60	Mr Paul Smith				I am fully supportive of the introduction of Article 4 in the area of Wainbody, Coventry. Having lived in the Cannon Park area since 1970 I have first-hand knowledge / experience of living in a neighborhood that has become over-run with HiMO's to the detriment of local young and professional families. The balance of ownership has swung too far away from such family ownership and this has led to a decline in the value and ambience of an otherwise family orientated suburb of Coventry. A 5% max limit of HiMO's is more than adequate for such an area of Coventry.	1	Other Policy HMO1 Homes in Multiple Occupation Policy HMO2 Concentrations and Thresholds Support
HMO/65	Mr Dennis Cullinane				I live on the Moreall Meadows estate which is adjacent to Warwick University. I have seen the negative impact on areas like Canley where there are numerous HMOs used mainly by students. Too many HMOs concentrated in an area greatly affects family and community life. I am totally against the same situation developing on the Moreall Meadows estate. As an individual resident I would suggest that the number of HMOs allowed on this estate is limited to a maximum of 5% of the total properties. There are 104 properties on the estate which would allow 5 HMOs in this area.	1	Policy HMO2 Concentrations and Thresholds Support

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HMO/75	The Coventry Society (Mr John Payne)			The Coventry Society	I support this policy.	1	Policy HMO1 Homes in Multiple Occupation Support
HMO/83	Mrs Wendy Scrivener				I support the City Councils proposals. It is vital to retain and if possible increase the availability of family homes in the city.	1	Policy HMO1 Homes in Multiple Occupation Support
HMO/84	University of Warwick (Mrs Vikki Lomas)			University of Warwick	<p>Having lived at my property for around 30 years now I am surrounded by rental properties that nobody takes any care or pride in and the area is starting to look like a slum.</p> <p>I have had to make complaints to EHO for rat infestations due to rubbish outside the house next door, none of the surrounding gardens are taken care of and noise issues are becoming more frequent.</p> <p>We have had notice of the 3 bedroom terraced house next door now wanting to be a 7 bedroom, this is just not acceptable on many levels - parking, rubbish facilities, noise of amount of</p>	1	Amenity Amenity General Observation Own experience Policy HMO4 Amenity and Design Support

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					<p>people in the house, extension overlooking my private garden and no doubt the garden still not being maintained.</p> <p>What was once a lovely friendly community Is now just a cash cow for greedy landlords and an extension of student accommodation.</p>		
HMO/85	Phyllis Hyde				<p>I strongly support what the Council is trying to do. I have lived next door to a rental property, which has been occupied by a variety of different tenants, over a long period of time. I have seen what changes occur when a primarily owner occupier/residential area changes character too rapidly both where I live and where friends and family live. There needs to be some sort of control here, as there is in other comparable cities. As a volunteer advisor at Coventry Citizens Advice, I see the impact of less than ideal landlords on the lives of some Coventry tenants.</p>	1	Policy HMO1 Homes in Multiple Occupation Support
HMO/86	Mrs Michele Gawthorpe				<p>Allowing multiple HMOs in our neighbourhood is detracting from its nature and desirability. Students do not care for the properties and large quantities of rubbish, overflowing skips and supermarket trollies are a sadly common sight around much of our area. Please help our area return to a lively and friendly area with neighbours who talk to each other and walk their children to</p>	1	Amenity Amenity General Observation Own experience Policy HMO4 Amenity and Design

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					the local primary school.		Support
HMO/87	mr jagtar rai				<p>There is a strong and compelling need for HMO's. Restricting them by implementing planning controls is totally unnecessary and is likely to have adverse impacts on the room let sector by pushing up prices for tenants as they compete for fewer available rooms. HMO's serve a need in the community but sadly they are marginilised by communities as having the 'wrong' type of tenants. Residents often complain of late night ubers, pizza deliveries, parking issues with parties day and night, however, this is far from the truth. The residents of such houses do not usually have cars and parties are rare based on the nature of the multiple occupation. We need to stop this stigma and NIMBYISM in our communities where we appear to want longer term tenants in our communities and discriminate against those that are there for short-medium term work or study. We should leave the forces of supply and demand to work and not interfere. Surely if there is local work contracts, university places etc in residents local area, surely HMO's come part and parcel of this environment? All that will happen if you restrict HMO's is this type of occupation will go underground and unregulated with the authority being able to do nothing. We need to stop marginilising and discriminating against such tenants and occupation as it seems longer term residents are only concerned for their house prices and their perception of the 'wrong' types of shorter term</p>	1	Object Object Policy HMO1 Homes in Multiple Occupation Policy HMO2 Concentrations and Thresholds

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					residents occupying what they perceive to be 'their' streets.		
HMO/88	Coventry Tree Wardens (Mrs Dorothy Brady)			Coventry Tree Wardens	<p>There have been many complaints that Coventry population projections are too high in the recent past. See link -</p> <p><a href="https://www.planningresource.co.uk/article/1715462/watchdog-finds-ons-population-projections-coventry-small-cities-potentially-high">https://www.planningresource.co.uk/article/1715462/watchdog-finds-ons-population-projections-coventry-small-cities-potentially-high</a></p> <p>I would like to see more detail about how the projected population increase is calculated</p> <p>If you include the population of students from the 2 universities, we need to remember that the vast majority of students are not permanent residents and that a high proportion of students are served by the many student accommodation buildings that have been built in recent times.</p> <p>I also want to know about the negative effects of the destruction of green land; destruction of green land, which adds to climate change and destroys wildlife environments.. All development must be weighed against Coventry people's need for green spaces and the mental and physical health benefits derived from them.</p>	1	Evidence base Miscellaneous Other

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HMO/95	Mrs. Barbara Moore				<p>Many permanent residents have been trying for years now to raise awareness to the detrimental effect of uncontrolled conversion of family homes into HMOs. Personally, since I first noticed the detrimental changes in our immediate neighbourhood in 2011, I have badgered Lower Stoke councillors, who have been very supportive, written many letters to the local press, and sat through many ward meetings, meetings of local residents' groups, and meetings with Planners and Council Officers, when we have urged the Council to introduce an Article 4 Direction to control the rapid proliferation of HMOs in our area and others.</p> <p>My husband George and I were founder members of a city-wide organisation, Coventry Action for Neighbourhoods (CAN), and together with other concerned residents' groups, have campaigned tirelessly for the Council to take control of the situation, pointing out that virtually every other University town in England had already used Article 4 to do so. The inevitable process of 'slumification' has gone largely unchecked as streets and whole areas begin to look shabby and run-down, and properties and their environs are neglected by transient tenants and 'rogue' landlords who don't care about their tenants or the area.</p> <p>We are glad to know that the Council is at last taking action, but are sorry to say that some areas of the city have already suffered considerable damage, probably irreparable, over recent years.</p>	1	Amenity Amenity General Observation Own experience

Comment ID	Respondent Name	Agent Name	Agent Organisation	Respondent Organisation	Comment	Comment number by this respondent	Tags against this comment
HMO/96	MR MIKE THOMAS				I live in Cannon Hill Rd and very concerned about the number of houses of multi occupation both here and in adjacent Cannon Park Estate. They are mainly occupied by students of Warwick University. Many such houses are visibly poorly maintained, the grass is never cut, the students cause a parking issue, late night parties are an issue, and there are already sufficient HMO's in the whole of the area. The value of our properties are clearly being affected by these issues significantly. I beg the council to do all in their power to stop more properties being used as such. So I support the move to implement Article 4.	1	Amenity Own experience Policy HMO1 Homes in Multiple Occupation Policy HMO4 Amenity and Design Support Support
HMO/97	Mrs Vina Mistry				I live on Moreall Meadows and next to a house that has been on rent for the last 12+ years. We have seen this house not maintained by the landlord, multiple tenants, fighting on the lawn, tenants not able to access the circuit board or know the basics and end up knocking on our door as the landlord doesn't always help. We've had tenants sub let on Airbnb and when people come they were not able to get in as the keys were not left for them and my husband has ended up arranging a room in a hotel in Kenilworth. We have had numerous problems with multi tenants and the landlord taking the money and not caring about the neighbourhood or the property.  We deeply care about the area we live in and the people who live	1	Air B&Bs Amenity Miscellaneous Own experience Policy HMO2 Concentrations and Thresholds Support

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					here. We want tenants to take responsibility of their property like the residents do and not add tenants that they do not look after and houses they do not manage. Please restrict the number of HMOs as this is having a great impact on full time residents.		
HMO/98	Mrs Debbie Williams				<p>There is a strong need for this in the Cannon Park area. Many family homes are now converted to HiMO's, often massively over developed. Some landlords take care of the properties, others do not, making the area appear untidy and run down.</p> <p>There is limited stock for families now and the prices are being driven up due to developers buying houses as soon as they are on the market as they have no chain or other commitments.</p>	1	Policy HMO1 Homes in Multiple Occupation Policy HMO4 Amenity and Design Support Support
HMO/102	Mr David Swanson				The bringing forward of an Article 4 Direction consultation by Coventry City Council is broadly welcomed. Living in the Cannon Park area of the Wainbody ward, we have seen an enormous increase in the number of HMOs in the past 10 years following the University of Warwick's declared intention to seek an increase in the number of students to be housed in the local community close to the university campus. I am not objecting to the fact that so many students live in the community as they are generally quiet and do not make any trouble; but what is unacceptable is the enormous loss of family homes and the	1	Amenity General Observation Own experience Policy HMO1 Homes in Multiple Occupation Support

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					<p>associated neighbourhood community.</p> <p>The largest single estate in the area, Cannon Park Estate, was previously home to over 300 professional families and couples. Now over 40% of these properties have been acquired by developer landlords and converted into HMOs generally housing between 4 and 8 students each. The local school was once thriving with children from the estate; now it has a relatively small intake from the estate and is dependent on attracting pupils from further afield who need to be driven to and from the school every day. In one 'sub-estate' comprising 134 properties, now over 80% have been converted to HMOs included many small semi-detached bungalows originally build to house retired couples. The conversion of all but one of these has effectively removed this valuable source of easy-manageable housing from the market and led to elderly residents being unable to down-size their property locally.</p> <p>In my personal opinion, the proposed introduction of Article 4 Direction is far too late to avoid the decimation of our local community, and should have been introduced as policy at the time the university stated its intent to promote housing students off-campus. Our local community association raised concerns about the proliferation of HMOs in 2011 but these concerns were ignored; applications to convert properties to HMOs were objected to with support from our local councillors but these objections were set aside; and despite constant lobbying for an</p>		

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					Article 4 Direction, the association was unable to stem the flow of HMO conversions. That said, so long as the policy is consistently implemented going forward, it will protect other local communities in ways that Cannon Park has not been able to enjoy.		
HMO/122	Mrs Joscelyne Bigham				As well as a focus on the wider impact on residents living within an area affected by HMOs, would it be possible to refer to the impact on health and wellbeing of the residents living in HMOs and the importance of having high quality housing standards for all.	5	Recommendations Suggested change to supporting text
HMO/123	Mrs Joscelyne Bigham				For the DPD to work successfully, it is important to have an accurate picture of the current level of HMOs within Coventry's wards at the street level. However, there is a concern that HMOs may be under recorded. Is there a register of existing HMOs which is regularly updated? Is there a mechanism in place to identify HMOs which are not registered? If not, is it possible to use the recent Census 2021 data to help identify them? Are there other ways of identifying HMOs that could be used? If they are not registered, should members of the public be able to report HMOs to the Council?	6	Evidence base Object Reporting mechanisms

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HMO/137	Andrew Staker				We would welcome the implementation of an Article 4 in the Cannon Park and Cannon Hill area's. However, we regularly walk both of the estates and the large number of properties that are HIMO's is very obvious. Overflowing waste bins, Tesco trolley's left outside front doors or left on pavements and some of the houses badly kept has spoilt what were Coventry City Council Flagship Estates. But they are both Band E Council Tax area's. Most of these houses could not be returned to normal family houses as it would cost too much to convert them back.	1	Amenity General Observation Own experience Policy HMO1 Homes in Multiple Occupation Support
HMO/139	Mrs Irina Lloyd-Maggs				Licence for HMOs should be granted only on the condition of a landlord providing off road parking spaces for his tenants. Otherwise, if there is no off road parking spaces to satisfy HMO these houses should be rented only on the condition that the tenants have no driving licence and the tenants should sign a special declaration that they would not use any on road parking. Furthermore, the houses that have no off road parking spaces should be rented only to a one single family. In the case of no provision for off road parking the licence for HMO should be refused.	1	Miscellaneous licensing regime
HMO/140	Mr Philip Bywater				See comments in later sections	1	Miscellaneous

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HMO/145	CARTA (MR GRAHAM PAINÉ)			CARTA	<p>As a longtime resident of Craven Street (I moved here in 1978) I feel that I am in an ideal position to comment, particularly as I have been chair of CARTA, the local residents and traders association (one of the very few in the country to include traders as well as residents), for some years. The area has suffered a slow, but inexorable, decline in recent years as we have seen an exodus of families (for which these former watch industry houses were constructed in the Victorian era). As families have moved out, these houses have been purchased by rapacious landlords with an eye to the quick buck who have converted these spacious properties to flats, leading to a massive increase in car ownership and reduction in care for properties. Worse, these conversions have often been carried out with no eye on maintaining appearance which has meant a much scruffier look now pervades the neighbourhood.</p>	1	Own experience
HMO/146	Mr Tom Woodard				<p>Reducing the number of new HMO will make more housing available for families and aids community cohesion.</p>	1	General Observation
HMO/147	Dave Adkins				<p>I am an absolute support of this new act.</p> <p>As a home owner sandwiched between 2 HMO's and the various challenges this brings, I wish to state my unequivocal support to make the new HMO act happen in Coventry. It is long awaited!</p>	1	General Observation Own experience Policy HMO3 Sandwiching Support

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					Dave Adkins		
HMO/161	Mr G S Jandu				I think a 5% limit will be a fair limit on estates which are primarily family estates. This will help in limiting Drugs, alcohol abuse, noise levels, litter, car parking, traffic and most importantly SECURITY. Security is a major problem as each adjoining householder usually keeps an eye on there neighbouring properties as as the link is broken by HMO there is a void and the existing householders become vulnerable so causing anxiety, depression and unable to leave there properties unsure if they will be safe on return. I strongly would like the limit to be NO MORE THAN 5%. THIS REPORT IS EVIDENCE BASED FROM THE EXISITING MULTI LET PROPERTIES IN THE AREA.	1	Own experience Policy HMO2 Concentrations and Thresholds Recommendations Suggested change to policy wording
HMO/171	Mr David Cass				This consultation relates to the change of use of properties from use class C3 (dwellinghouse), to use class C4 (small HMO) or <i>Sui generis</i> (large HMO). This consultation makes no reference to occupation that changes the use from C3 to occupation let via Airbnb, which could be short or long term and to a potentially changing number of related or unrelated people. Airbnbs are now very common and I am aware of at least 3 properties in my street that are let through Airbnb and cause the same problems as	1	Air B&Bs Miscellaneous

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					HMOs. Will Airbnbs be covered by Article 4?		
HMO/181	Mrs Jillian Cass				This consultation relates to the change of use of properties from use class C3 (dwellinghouse), to use class C4 (small HMO) or <i>Sui generis</i> (large HMO). This consultation makes no reference to occupation that changes the use from C3 to occupation let via Airbnb, which could be short or long term and to a potentially changing number of related or unrelated people. Airbnbs are now very common and I am aware of at least 3 properties in my street that are let through Airbnb and cause the same problems as HMOs. Will Airbnbs be covered by Article 4?	1	Air B&Bs Miscellaneous
HMO/34	Mr Keith Struthers				The problem for the Cannon Park/Cannon Hill Road area (CP/CHR area) is that there was no control of the way property development took place here. There was a demand for housing of University of Warwick students, and home owning Council Tax paying residents were essentially ignored. Properties were bought by developers for commercial reasons, and there was no consideration of the consequences for local residents. One major consequence is that very few children from CP attend the CP Primary School. The cosmopolitan, family orientated suburb of CP was irrevocably changed.  Now in CP with about 40% of properties as HMOs, many of 6 or	2	General Observation Statistical evidence

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HMO/44	Madelein Struthers				<p>less persons, and the neighbourhood requires local residents to regularly help student HMO occupants with ongoing issues such as refuse disposal in order to keep the areas in reasonable condition. The University, Landlords, and local Councillors are generally not interested in these issues.</p> <p>In view of the current 40% HMO-isation of CP, Article 4 Direction must be introduced to control this process, combined with a more accountable Planning process. Discussion must take place with all parties as to the maximum allowable HMO-isation of the area.</p> <p>In addition, there is evidence that many HMOs are unlicensed. For HMOs occupied by students, there needs to be a (confidential) mechanism to cross check student addresses with CCC licensing data. It is only in this way that unlicensed HMOs are identified.</p> <p>The Iceni document astonishingly makes no reference to the CP/CHR side.</p> <p>Cannon Park Estate (CPE) must have Article 4 Direction introduced so that all applications require permission. HMOs here are for UoW students, and this has placed an unacceptable burden on the social fabric of the Estate.</p>	3	Policy HMO2 Concentrations and Thresholds Support

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					<p>In addition to this, there needs to be more robust refusal of applications by Planning Committee, especially where the application will result in a change to the local neighbourhood character.</p> <p>Furthermore, all HMOs require licensing. On CPE a significant number are unlicensed. This has to improve, with more robust inspection.</p>		
HMO/76	The Coventry Society (Mr John Payne)			The Coventry Society	I support the council's efforts to bring HMOs under control. The damage caused to some neighbourhoods by unconstrained changes of use needs to be reduced for the benefit of resident families.	2	Policy HMO1 Homes in Multiple Occupation Support
HMO/103	Mr David Swanson				The need to better control the expansion of HMO housing stock is fully supported to prevent blighting local communities when HMOs become a significant part of a local community, as is the case in the Cannon Park Estate, and is increasingly the case in the housing estates off Cannon Hill Road. The issues identified in paragraph 2.3 are well recognised and are very evident in local community areas where HMOs have proliferated, particularly the issue of waste management and recycling. It is recommended that the need for effective management of waste be made a mandatory requirement for routine licencing of HMOs with	2	Policy HMO2 Concentrations and Thresholds Support

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					potential withdrawal of licences if waste regularly becomes a problem. Unfortunately, in the local area, too many HMOs remain unlicensed, and effectively outside of any direct council intervention. It is essential that, with the introduction of Article 4 Direction, there is a mandatory requirement to licence HMOs that achieve approval through the planning process.		
HMO/141	Mr Philip Bywater				See comments in later sections	2	Miscellaneous No comment
HMO/148	Philip Cowen				I agree and until January 2021 lived in Craven Street, Chapelfields for over 22 years. In that time the number of HMOs increased dramatically and the number of family homes reduced significantly. It became more difficult to park, there was more litter in the area and the wheelie bins were often left out all week. In addition more people came into the area to visit the pubs, which became more popular with little consideration for residents. Successive planning applications were approved and the developers were able to conduct their parking surveys to suit their purpose and prove whatever they wanted. This was all to the detriment of residents in the area.	1	Amenity Own experience
HMO/162	The Coal Authority (Mrs Melanie Lindsley)			The Coal Authority	It is noted that this current consultation relates to a Homes in Multiple Occupation DPD. I can confirm that the Planning team	1	Miscellaneous No comment

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					at the Coal authority have no specific comments to make on this document.		
HMO/35	Mr Keith Struthers				<p>The cosmopolitan, family orientated character and appearance of the Cannon Park Estate (and Cannon Hill Road area as well) has been irrevocably changed by uncontrolled HMO-isation.</p> <p>There was never any demonstrable consideration of this change in character by CCC, developers or the University, and the consequences for home owning resident Council Tax payers.</p>	3	Amenity General Observation
HMO/45	Madelein Struthers				<p>On Cannon Park Estate (CPE) the 40% HMO-isation rate is unacceptable. NPPF has not been used to maintain the character and appearance of CPE. The social fabric has disintegrated over 10 years with HMO-isation. Overall the standard of the Estate has decayed.</p> <p>This needs to stop, Article 4 Direction must be applied to the Estate, and a cap put on further HMOs as soon as possible.</p>	4	General Observation Statistical evidence
HMO/82	Mr Suresh Munyal				I would like to propose that we have no more than 5% of HMOs in any neighbourhood to prevent any disruption of family life.	1	Recommendations Suggested change to policy wording

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					I live next to Warwick University. I do feel that the universities should make proper provision for taking on more and more students.		
HMO/104	Mr David Swanson				<p>The introduction of policy withdrawing the Permitted Development Rights to convert properties from Residential to 'small HMO' is welcomed as a key step to controlling the currently uncontrolled HMO situation. However, it is important to ensure that any such policy introduced is rigorously and consistently applied in relation to the threshold criteria approved at the same time, i.e. limiting the density of HMOs in a specific area (as proposed at 10%), limiting the 'sandwiching' of private residences between HMOs, and restricting the creation of runs of adjoining HMOs in a street. It is also extremely important that planning enforcement is robustly applied and much more interventionist than at present where developers too frequently undertake the conversion and then apply for retrospective approval, this being seen as a way of achieving their aims without approval being achieved, especially when there is little prospect of enforcement demanding the reinstatement of properties which do not achieve the necessary approval.</p> <p>The prevailing character of localities and communities should also be a consideration when HMO proposals are presented for approval. A prime example being the complete change in demographics and community spirit in the Cannon Park Estate</p>	3	General Observation Policy HMO3 Sandwiching Statistical evidence Support

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					<p>over the last 10 years as over 40% of properties have been progressively removed from the family homes context to become short stay tenancies for students. A change of such magnitude has effectively torn the heart out of what was previously a pleasant residential area.</p>		
HMO/142	Mr Philip Bywater				<p>This section sets out the Council's Local Plan policy (H11) on HiMOs, which was adopted in 2017. This policy does not permit the development of HiMOs that will materially harm the amenities of nearby properties, the appearance or character of the area, local services and the amenity value and living standards of occupants, their internal space and garden/amenity value. Yet this consultation document clearly acknowledges that only 5 years after this policy was adopted, 11 Wards in the City contain areas of harmful concentrations of HiMOs, creating exactly the problems that H11 was supposed to prevent.</p> <p>Despite strong action from some of the communities affected and pleas for Article 4 to be introduced years ago, the Council continued the ignore concerns and in doing so, ignored the NPPF requirement for the planning system to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes be provided to meet the needs of present and future generations.</p> <p>I live in CV4 and it is my belief (and that of many residents) that</p>	3	Amenity Own experience

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					<p>the two universities have attracted thousands of UK and overseas students to the city (which is great), with woefully inadequate provision of accommodation, once here. It has been left to the Market to sort the situation out, which has resulted in investors out bidding families for local housing, displacing families and elderly people to provide low quality, overcrowded, poorly managed student housing. Demand has massively outstripped the supply of homes in these areas. There have been around 700 new houses (with a few apartments) built in Canley, on scarce development land, in the last few years and although I don't have precise figures, my estimate would be that at least half (and probably more) of these have been bought by investor purchasers and rented to students. That does not fit well the NPPF requirement referred to above. It is noted that in the last 2-3 years large numbers of purpose built student housing developments have been completed in the city centre and one near Cannon Park.</p> <p>Communities have been badly damaged by this failure to control movement from use class C3 to C4 ('permitted development') which has left a legacy of many unsightly, overdeveloped and inappropriate properties and loss of community cohesion. Much of the damage cannot be put right but a strengthened Article 4 (see comments und Key Issues and Q3) can hopefully prevent the situation from getting any worse.</p>		
HMO/149	Philip Cowen				3.10 - one problem has been developers undertaking work without	2	Amenity Own experience

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					planning permission and then having the apply retrospectively with negotiation with the council. There are many unscrupulous developers who believe they can do as they please. For example the house on Queensland Avenue near the lights at Hearsall Lane. This was converted for 9 residents without planning permission and had to be highlighted to the council.		
HMO/163	CARTA (Miss Sian Thuraisingam)			CARTA	<p>Developers have had no regard for the provision of suitable parking – the houses which are being converted to HMOs have narrow frontages and no off-street parking – the additional volume of cars cannot be supported</p> <p>the character of the area is changing because there are more transient residents who do not necessarily have the same regard for the conservation area status as longer-term residents</p>	1	Amenity Amenity General Observation Own experience
HMO/172	Mr David Cass				This section sets out the Council's Local Plan policy (H11) on HiMOs, which was adopted in 2017. This policy does not permit the development of HiMOs that will materially harm the amenities of nearby properties, the appearance or character of the area, local services and the amenity value and living standards of occupants, their internal space and garden/amenity value. Yet this consultation document clearly acknowledges that only 5 years after this policy was adopted, 11 Wards in the City contain areas	2	Existing Local Plan Policy Miscellaneous

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					<p>of harmful concentrations of HiMOs, creating exactly the problems that H11 was supposed to prevent.</p> <p>Despite strong action from some of the communities affected and pleas for Article 4 to be introduced years ago, the Council continued the ignore concerns and in doing so, ignored the NPPF requirement for the planning system to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes be provided to meet the needs of present and future generations.</p> <p>I live in CV4 and it is my belief (and that of many residents) that the two universities have attracted thousands of UK and overseas students to the city (which is great), with woefully inadequate provision of accommodation, once here. It has been left to the Market to sort the situation out, which has resulted in investors out bidding families for local housing, displacing families and elderly people to provide low quality, overcrowded, poorly managed student housing. Demand has massively outstripped the supply of homes in these areas. There have been around 700 new houses (with a few apartments) built in Canley, on scarce development land, in the last few years and although I don't have precise figures, my estimate would be that at least half (and probably more) of these have been bought by investor purchasers and rented to students. That does not fit well the NPPF requirement referred to above. It is noted that in the last 2-3 years large numbers of purpose built student housing developments</p>		

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					<p>have been completed in the city centre and one near Cannon Park.</p> <p>Communities have been badly damaged by this failure to control movement from use class C3 to C4 ('permitted development') which has left a legacy of many unsightly, overdeveloped and inappropriate properties and loss of community cohesion. Much of the damage cannot be put right but a strengthened Article 4 (see comments und Key Issues and Q3) can hopefully prevent the situation from getting any worse.</p>		
HMO/182	Mrs Jillian Cass				<p>This section sets out the Council's Local Plan policy (H11) on HiMOs, which was adopted in 2017. This policy does not permit the development of HiMOs that will materially harm the amenities of nearby properties, the appearance or character of the area, local services and the amenity value and living standards of occupants, their internal space and garden/amenity value. Yet this consultation document clearly acknowledges that only 5 years after this policy was adopted, 11 Wards in the City contain areas of harmful concentrations of HiMOs, creating exactly the problems that H11 was supposed to prevent.</p> <p>Despite strong action from some of the communities affected and pleas for Article 4 to be introduced years ago, the Council continued the ignore concerns and in doing so, ignored the NPPF requirement for the planning system to support strong, vibrant and healthy communities by ensuring that a sufficient number and</p>	2	Existing Local Plan Policy Miscellaneous

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					<p>range of homes be provided to meet the needs of present and future generations.</p> <p>I live in CV4 and it is my belief (and that of many residents) that the two universities have attracted thousands of UK and overseas students to the city (which is great), with woefully inadequate provision of accommodation, once here. It has been left to the Market to sort the situation out, which has resulted in investors out bidding families for local housing, displacing families and elderly people to provide low quality, overcrowded, poorly managed student housing. Demand has massively outstripped the supply of homes in these areas. There have been around 700 new houses (with a few apartments) built in Canley, on scarce development land, in the last few years and although I don't have precise figures, my estimate would be that at least half (and probably more) of these have been bought by investor purchasers and rented to students. That does not fit well the NPPF requirement referred to above. It is noted that in the last 2-3 years large numbers of purpose built student housing developments have been completed in the city centre and one near Cannon Park.</p> <p>Communities have been badly damaged by this failure to control movement from use class C3 to C4 ('permitted development') which has left a legacy of many unsightly, overdeveloped and inappropriate properties and loss of community cohesion. Much of the damage cannot be put right but a strengthened Article 4 (see comments und Key Issues and Q3) can hopefully prevent the</p>		

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					situation from getting any worse.		
HMO/13	Leah Tardivel				<p>The major issues where I am are parking, as they often have several cars. This can spill into adjacent streets where things are really bad.</p> <p>There's also a huge step in price from smaller homes that can't easily be converted to an HMO to slightly larger single family dwellings that can, meaning families can't afford to move out of crowded housing because the price jump is too high.</p>	1	Amenity Own experience
HMO/21	Miss Cathy Pallister				the bullet points in 4.1 are spot on and these are my concerns and my neighbours who own their homes in this area.	2	Key Issues Support
HMO/26	None (Ms Janet Dixon)			None	I have been concerned for many years with the way my local area has changed because of the increase in HMOs which has caused problems with parking, refuse, a constantly changing population so that there is less social cohesion, loss of housing stock for families and anti social behaviour by some tenants. I strongly approve the plan to control the number of HMOs in an area as discussed above.	1	Amenity Key Issues Own experience Support

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HMO/36	Mr Keith Struthers				<p>For Cannon Park Estate and the Cannon Hill Road areas, the comment becomes repetitive. In CP the HMO rate is 40%, and thresholds and sandwiching were never considered in planning applications. The uncontrolled HMO-isation of the area has led to dramatic social changes in a cosmopolitan, family orientated community, which have essentially been ignored.</p> <p>The Iceni document, which is apparently a key part of the evidence base, does not mention the criteria of sandwiching and thresholds or Local Policies at all. They are fundamentally essential for inclusion, along with Article 4 Direction..</p>	4	Amenity Evidence base Object Own experience
HMO/46	Madelein Struthers				<p>All the issues listed above apply to Cannon Park Estate (CPE). In addition, the dramatic change in social character of CPE now means that elderly single individuals are isolated and lonely, in the middle of student HMOs.</p> <p>Sandwiching and thresholds were never considered.</p>	5	Key Issues Support
HMO/77	The Coventry Society (Mr John Payne)			The Coventry Society	I support this approach.	3	Key Issues Support

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HMO/78	The Coventry Society (Mr John Payne)			The Coventry Society	This is a fair representation of the problems experienced in some Coventry neighbourhoods	4	Key Issues Support
HMO/89	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p>The CCWMP agrees with the identified potential issues that arise from such concentrations of HMOs, summarised as reduced social cohesion, reduced housing choice, reduced community engagement, noise and disturbance, overlooking and loss of privacy, degradation of visual amenity including through poor waste management, building maintenance, building alterations and frontage car parking, the reduction in local community services with shift to targeted retail/business including proliferation of hot food takeaways, and highway safety concerns.</p> <p>The CCWMP is aware that in some areas an over-concentration of HMO can create a transient population and whereby properties can be vacant for several weeks at a time. Development which increases the transient population or property vacancy within a neighbourhood can hinder the reduction in crime.</p>	1	Key Issues Support
HMO/94	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p><b>Detailed Comments on the Proposed Article 4 Direction</b></p> <p>The proposed Article 4 Direction (Homes in Multiple Occupation (HMO)) seeks to remove the permitted development right for the conversion of a residential dwellings to small HMO as provided</p>	6	A4D Miscellaneous

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					<p>for under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), Schedule 2, Part 3, Class L(b), that is: '<i>Development consisting of a change of use of a building - ... (b) from a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order, to a use falling within Class C4 (houses in multiple occupation) of that Schedule'</i></p> <p>The proposed Article 4 Direction would only apply in the Schedule 2 listed wards of: Cheylesmore, Earlsdon, Foleshill, Lower Stoke, Radford, Sherbourne, St Michaels, Upper Stoke, Wainbody, Westwood and Whoberley.</p> <p>The Article 4 Direction was made under Seal on 8 September 2022 and is expected to come into force no sooner than 1 July 2023.</p> <p>The CCWMP has noted that all the Draft Policies set out within the DPD would only apply to applications for large HMOs <u>unless</u> the proposed Article 4 Direction comes into force, <u>whereupon it will only apply</u> to applications for large HMOs across the city and for the conversion to small HMOs within the identified 11 wards; it thereby excludes 7 wards within the City's administration.</p> <p>However, it is noted that the DPD (paragraph 5.9) states that 'Restricting HMO supply in one neighbourhood, may prompt landlords to examine adjoining areas, displacing the</p>		

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					<p>concentration'. Furthermore, this paragraph goes on to state that 'Consequently, boundaries may change, new areas may be identified. Such areas would be subject to the preferred option policy'. However, unless these areas are included within the Article 4 Direction, the permitted development right for the conversion of a residential dwelling (Use Class C3) to a small HMO (Use Class C4) would remain, such that these conversions would not require planning permission or thereby, be subject to the proposed assessment set out within the Draft Policies of the DPD.</p> <p>Given the potential for displacement and the identified issues arising from the over-concentration of HMOs in any one area, the CCWMP strongly suggests that the Article 4 Direction be amended to be City-wide.</p>		
HMO/99	Mrs Debbie Williams				I agree with the list of issues given and feel they are occurring in my local area. The occupants of HiMOs tend to have less respect for their local area/ surroundings e.g. leaving litter, abandoning trolliwe from Tesco and so on.	2	Key Issues Support
HMO/105	Mr David Swanson				The issues and impacts of the significant accumulations of HMOs as set out in para 4.1 are well recognised in the Cannon Park Estate/Cannon Hill Road neighbourhoods.	4	Amenity Evidence base Own experience Support

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					<p>Loss of social cohesion in the area is prevalent throughout our community due to the change in demographics, the loss of family and neighbourly contact, the increasing number of isolated single elderly people living in properties surrounded by HMOs, and the basic fact that ageing long term residents have little in common with what has become primarily overseas student short term neighbours. The transient nature of HMO tenancies has a direct impact on the ability for local communities to be created and the establishment of the bonds that make such communities succeed.</p> <p>The unrestricted conversion of smaller properties, particularly bungalows in our local community has led to the loss of these homes from the housing market, effectively denying ageing residents the opportunity to 'down-size' and leaving them with the worries and mental health concerns of looking after properties that are too big for their needs. The existence of unrestricted Permitted Development Rights for such properties has been a prime factor in the loss of this important housing stock.</p> <p>The over-development of so many properties, particularly the larger Sui Generis HMOs, has resulted in significant intensification of both the massing of such properties and the number of persons living in them, with consequent increases in the number of people coming and going, the number of cars parked or visiting, the amount of waste being produced (i.e. the number of bins required), the impact of annual tenancy changes including remediation works, clearing of properties, volumes of</p>		

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					<p>waste created, and occasions of 'fly tipping'; all of which directly impact on the look and feel of local streets and neighbourhoods for local residents.</p> <p>It is considered essential that the implementation of any Article 4 Direction and its associated policies, directly and consistently address the issues identified.</p> <p>The three Key Issues set out in section 4, Concentration, Sandwiching and Threshold, if accompanied by the proposed removal of Permitted Development Rights, are all supported and will be beneficial so long as they are consistently applied during the formal planning process and if failure to comply with the planning process results in effective enforcement action being taken; both features that do not seem to be consistently evident in the current planning process.</p>		
HMO/116	Mrs Joscelyne Bigham				<p>Please consider adding the following to the list of issues:</p> <ul style="list-style-type: none"> <li>• Reduction in green space and increase in urban creep (increasing flood risk within an area) as gardens are used for parking, building extensions, etc. Areas which have higher levels of densification, infill, backland development and HMOs will need more public open space for health and wellbeing.</li> <li>• Increase in level of fly-tipping within the local area</li> </ul>	1	Amenity Amenity General Observation Key Issues Own experience Support

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					<p>especially when a resident moves in/out of a property, e.g. old mattresses.</p> <ul style="list-style-type: none"> <li>• Increase in demand for local services, e.g. GP, dentist.</li> <li>• Insufficient storage areas for waste leading to health and safety issues, e.g. bin bags piled up in gardens attracting vermin.</li> <li>• Security issues leading to increased levels of crime, e.g. insecure access and poor lighting, lack of secure cycle parking, on street parking of work/delivery vans owned by residents, management of post and deliveries. Should 'Secured by Design' guidelines (<a href="https://www.securedbydesign.com/guidance/design-guides">https://www.securedbydesign.com/guidance/design-guides</a>) be referred to?</li> <li>• Lack of safeguarding measures for women, minors, vulnerable young adults, people with learning disabilities, etc. Are there any specific regulations/rules involving the safeguarding of children?</li> <li>• Insufficient cooking and secure food storage facilities leading to over reliance on takeaways, etc. This could lead to poor diet, cost of living issues, etc.</li> <li>• Insufficient provision for washing and drying clothes could lead to health problems as hanging damp washing in rooms could lead to poor living conditions i.e., damp and mould. It would also have an impact on the cost of living as overuse of tumble dryers would increase electricity bills and the use of laundry services would add additional expense.</li> </ul>		

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					<ul style="list-style-type: none"> <li>Poor standards in heating, insulation and ventilation of buildings could lead to cost of living issues and health problems, such as respiratory illnesses caused by condensation, damp and mould (<a href="https://www.euro.who.int/__data/assets/pdf_file/0003/78636/Damp_Mould_Brochure.pdf">https://www.euro.who.int/__data/assets/pdf_file/0003/78636/Damp_Mould_Brochure.pdf</a>).</li> <li>Shared use of washing facilities and toilets, if they are not kept clean, and restricted access to hot water could also cause health issues.</li> </ul>		
HMO/119	Cheryl Revill				<p>We are in agreement with the outlined issues in this section. We feel it important to limit the number of HIMO's in order to preserve quieter family environments where properties are well maintained, roads and streets are less congested with vehicular parking and there is less overdevelopment of average sized houses into oversized properties which are far too overbearing on neighbouring non-HIMO properties.</p>	1	Key Issues Support
HMO/124	Mr Paul Newman				<p>I believe the issues stated do reflect what I have seen in our area. Residents of our local HMOs change on a very frequent basis, sometimes only a matter of weeks. This means that they are not involved in the community and have very little regard for their surroundings. We have seen an increase in rubbish discarded from vehicles straight into the street as well an increase in fly tipping when people move out of</p>	1	Amenity Key Issues Own experience Support

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					<p>properties.</p> <p>Developers have been able to outprice owner occupiers so that there is now an imbalance in long term residents versus short term HMO residents. Family housing stock has been converted to HMOs to get the most profit and this has led to families leaving the area and new families not moving to the area because they can no longer afford it and there are less homes available.</p> <p>Our area is a conservation area with very limited parking, the majority of which is on street. The houses are narrow terraced houses - in the past there may have been 2 cars per house, however with the conversions there are now sometimes 5 cars for a house. This is a real issue in our area which has meant long term residents are thinking of leaving as they are now unable to park anywhere near their homes. Our area also has a number of pubs which people do drive to - the pubs are a key part of the area and have been around far longer than the HMO conversions, the area simply cannot cope with the increase in volume of vehicles because of HMOs.</p>		

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HMO/134	Mr Ian Stevenson				The 10% Threshold test should also apply where Purpose Built Student Accommodation blocks are proposed within 100m of existing residential areas.	1	Other Policy HMO2 Concentrations and Thresholds
HMO/143	Mr Philip Bywater				<p>Q1. Yes these represent my experiences, although I would add poor design and loss of amenity/greenspace.</p> <p>Key Issues – Under HMO Thresholds I would add the following comment:-</p> <p>As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should be a further layer of control so that the 10% figure should also not be exceeded within a 500 metre radius. This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.</p>	4	Amenity Key Issues Object Own experience Policy HMO2 Concentrations and Thresholds Support

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HMO/150	Philip Cowen				<p>It is important that a proper register of HMOs is compiled and kept up to date otherwise the threshold test cannot be accurately applied. Local knowledge can help identify which properties are occupied as HMOs and the council should follow up on all suspected properties to establish this.</p> <p>I agree with all of the issues identified and I would also include lack of parking among these as well. Also, as the character of an area changes the way it is perceived by developers and also Estate Agents changes. When we sold our house on Craven Street the Estate Agent said it was too large for a family and only suitable for developers. I'm convinced that they took this view to make their life easier and in the hope of a quick sale with little need for real selling effort. This perpetuates the change in the character and decline of an area.</p>	3	Amenity Evidence base Other Own experience
HMO/164	CARTA (Miss Sian Thuraisingam)			CARTA	<p><b>Section 4.1 – comments in red (have been put in italics when inputted into Inovem)</b></p> <ul style="list-style-type: none"> <li>Reduced social cohesion resulting from the short-term nature of residencies involved with HMOs which may involve younger people overall - demographic imbalance. <i>This is an issue in our area. HMO residents are temporary residents and often do not engage in local</i></li> </ul>	2	Amenity Amenity General Observation Key Issues Own experience Support

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					<p><i>community activities.</i></p> <ul style="list-style-type: none"> <li>• Reduced housing choice resulting from housing type/tenure imbalance (e.g. a shift from permanent family housing to more transient accommodation); <i>Yes – there is now a lack of available family housing because developers have converted houses into HMOs</i></li> <li>• Reduced community engagement from residents resulting from an increase in the transient population of an area; <i>Yes</i></li> <li>• Noise and disturbance resulting from intensification of the residential use and/or the constantly changing nature of households; <i>This is not a particular concern in our area.</i></li> <li>• Overlooking and loss of privacy resulting from poorly considered internal layouts and intensification of use; <i>We have not noticed this</i></li> <li>• Detriment to visual amenity resulting from poor waste management, poor property maintenance, accumulative external alterations to properties and use of frontage areas for off-street parking; <i>We do feel that there is an increase in poor waste management and property maintenance, however we have very few properties where frontage areas are large enough for off-street parking so this is not an issue.</i></li> <li>• Reduced community services resulting from a shift in the retail/business offer towards a narrower demographic such as the proliferation of Hot Food Takeaways; and</li> </ul>		

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					<ul style="list-style-type: none"> <li>Highway safety concerns resulting from congested on-street parking and poor waste management. Yes, <i>these are two of our biggest concerns. Our streets simply cannot take the extra volume of vehicles that the conversions have added to our roads. We do not have off road parking available and residents have been known to sometimes park two abreast out of frustration, this is obviously a serious risk to traffic travelling down our streets. Long term residents are considering leaving the area because they can no longer park anywhere in the area. We have seen an increase in overflowing bins where tenants do not necessarily know/care about which bins to use and hence waste overflows. We also have seen an increase in fly tipping of mattresses etc as tenants change.</i></li> </ul>		
HMO/170	Cannon Park Community Association (Mr David Swanson)			Cannon Park Community Association	<p>Looking at the specific issues of high density HMO properties affecting the Cannon Park/Cannon Hill Road area, the following points reflect those outlined in section 4 of the Development Plan Document:-</p> <ol style="list-style-type: none"> <li>Significant loss of social cohesion in the area resulting in many private residents, often single elderly lady residents being effectively isolated from their neighbours by several HMOs. This has led to a loss, if not total absence of community spirit and support to the detriment</li> </ol>	1	Amenity Own experience

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					<p>of these ageing residents. It is very evident that the HMO tenants who are generally overseas students have little or no interest in integrating with the local community residents, and likewise, the local residents have little in common with the students either. The short term nature of HMO tenancies further impacts on the ability of residents to form effective communities, further leading to isolation and loss of local social cohesion.</p> <p>2. The wholesale conversion of properties, particularly bungalows, in the Cannon Park Estate has led to the loss of these homes to the private housing market and the effective removal of down-sizing opportunities for elderly residents locally. Looking back 10 years, many of the bungalows which are located within easy walking distance of the local shopping centre were homes for retired couples; now all but one are HMOs. Similarly, in another street, 6 out of 18 bungalows are now HMOs of which 5 are adjacent properties, and to emphasise point 1 above, of the other 12, 7 are occupied by single elderly persons of which 6 are ladies.</p> <p>3. Where properties have been bought by developer landlords for extension and conversion into HMOs, the extensions are frequently very large and out of keeping with the existing property, neighbouring properties and the general look and feel of the street. Despite these extension being presented for planning approval, the application of the National Planning Policy Framework,</p>		

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					<p>relevant local planning policies and the views of local residents to be arbitrarily applied with some applications being refused on policy grounds whilst others of similar size and impact are approved. The situation is further compounded by developments proceeding despite being refused or with works undertaken on the assumption that retrospective planning approval will be secured.</p> <p>4. Within Cannon Park Estate, the adverse impact of HMOs on visual and social amenity is significant, particularly from inadequate maintenance of properties including front gardens and property paintwork, the unattractive use of net curtains and closed curtains, and the very frequent poor waste management leading to incorrect bin use, failure to put bins out for collection and bins left out for days when they are deemed to be filled with the wrong waste. Local private residents do what they can to help with the waste management situation but the failure by some landlords and management agents to provide clear guidance and tenancy obligations leads to what has become an unacceptable situation and potential conflict. Periodic property refurbishment and the annual clear out of properties also tends to impact local residents due to construction noise, the number of contractors and the parking of skips on gardens, verges and the roads.</p>		

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HMO/173	Mr David Cass				Q1. Yes these represent my experiences, although I would add poor design and loss of amenity/greenspace.	3	Amenity Key Issues Own experience Support
HMO/174	Mr David Cass				Key Issues – Under HMO Thresholds I would add the following comment:-  As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should be a further layer of control so that the 10% figure should also not be exceeded within a 750 metre radius (but would not apply to any residential accommodation provided within the university campuses themselves). This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.	4	Object Policy HMO2 Concentrations and Thresholds

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HMO/183	Mrs Jillian Cass				<p>Q1. Yes these represent my experiences, although I would add poor design and loss of amenity/greenspace.</p>	3	Amenity Key Issues Own experience Support
HMO/184	Mrs Jillian Cass				<p>Key Issues – Under HMO Thresholds I would add the following comment:-</p> <p>As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should be a further layer of control so that the 10% figure should also not be exceeded within a 750 metre radius (but would not apply to any residential accommodation provided within the university campuses themselves). This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.</p>	4	Object Policy HMO2 Concentrations and Thresholds

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HMO/3	Rebecca Thompson				If we continue without article 4, yet more small HMO developments will crop up and negatively impact certain areas. Article 4 is needed urgently to help balance housing and communities, but a consistent approach is needed - not just favouring the wards where residents shout loudest, already with a strong sense of identity. The provision of purpose built student accommodation appears to have made little difference- students and corporate lettings with their work vans seem to have taken over the area in the last 2-3 years	2	A4D Miscellaneous Policy HMO1 Homes in Multiple Occupation Support
HMO/15	Leah Tardivel				It's a good start. It may be too late. We've lost so many houses over the last year. We could do with more robust responses to noise and parking complaints in order to help to limit the issues associated with the existing homes. For example, in Argyll Street the lines are barely existent, no one will come out in a timely fashion to manage parking issues and noise complaints are so frequently ignored that they might as well not exist.	3	Policy HMO1 Homes in Multiple Occupation Support
HMO/28	None (Ms Janet Dixon)			None	Doing nothing is not acceptable. There must be some control over what developers can do to the properties in our areas and to ensure our communities survive and do not become streets of bedsits with a churning population.	3	Policy HMO1 Homes in Multiple Occupation Support

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HMO/38	Mr Keith Struthers				<p>The Iceni report does not mention the Cannon Park estate and Cannon Hill Road area at all, so is completely devoid of any evidence on these areas. Key relevant evidence has been supplied by Cannon Park Community Association to CCC officers listed in the DPD.</p> <p>At 40% HMO rate in Cannon Park there needs to be appropriate consideration of remaining local Council Tax paying, home owning residents. In addition to introduction of Article 4 Direction, use of thresholds and sandwiching, and review and application of policies DE1, H3 and H5 and NPPF 2019 must be made at every review of a planning application before the Planning Committee.</p>	6	Evidence base Object
HMO/48	Madelein Struthers				<p>Cannon Park Estate (CPE) is a mixture of terraced bungalows and houses, as well as individual bungalows and 2 storey houses on larger properties. In the Greens the HMO rate is 80%, Unacceptable.</p> <p>Article 4 Direction must be introduced to ensure that HMOs of 6 or less rooms require planning permission, to at least give some protection, but this needs to be combined with more stringent application of policies and NPPF by planning Committee.</p>	7	A4D Amenity Miscellaneous Own experience Policy HMO1 Homes in Multiple Occupation Support

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HMO/63	Ms Clair Henrywood				I worry that selecting just the wards listed could lead to a proliferation of hmos moving into the wards not included in the list to avoid "red tape". I have seen first hand how hmos are driving families out of areas. Would strongly recommend that the proposed changes are applied city-wide and not kept to the selected wards.	1	A4D Miscellaneous
HMO/68	Mr Jon Hodge				I would support an immediate introduction of Article 4 to appropriately manage the number and locations of HMOs	3	A4D Miscellaneous
HMO/79	The Coventry Society (Mr John Payne)			The Coventry Society	Yes I feel that this approach is reasonable and balanced.	5	Policy HMO1 Homes in Multiple Occupation Support
HMO/90	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p>This question relates to the <b>Draft Policy HMO-01 (Houses in Multiple Occupation)</b> which requires that all applications for HMOs would be required to demonstrate:</p> <ul style="list-style-type: none"> <li>a) There is good accessibility to local amenities and public transport;</li> <li>b) They accord with the emerging Accessible Homes Standards (or future equivalent) and provide satisfactory living</li> </ul>	2	Other Other Policy HMO1 Homes in Multiple Occupation Policy HMO4 Amenity and Design Support

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					<p>accommodation for intended occupiers; and</p> <p>c) There is no demonstrably adverse impact on the amenity of neighbouring properties or character of the area by way of character, appearance, highway safety and parking.</p> <p>The policy also requires that the application for HMOs meet the criteria in draft policy HMO-04.</p> <p>The CCWMP notes that there is some duplication / cross-over between Draft Policy HMO-01 and Draft Policy HMO-04, which both set out criteria against which an application for an HMO would be assessed. It is considered this is unnecessary and could lead to conflicts should the referenced standards become out of sync (for example, if the Accessible Homes Standard (once adopted) or a future equivalent were to conflict with specific accommodation standards referenced in Draft Policy HMO-04) with the effect of reducing the weight afforded to either policy. Commentary is provided on this matter under Question 5 below.</p> <p>Notwithstanding, the CCWMP supports the principle of Draft Policy HMO-01, that there should be clear standards against which future applications for HMOs should be considered. Furthermore, that these standards should include adequate provisions to design out crime, which is also addressed within our commentary under Question 5 below.</p>		

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HMO/107	Mr David Swanson				<p>The proposed policy approach is supported subject to consistent application.</p> <p>Para 5.6 references the HMO licensing regime however, no reference is made to the fact that large numbers of HMOs continue to operate without being licensed, effectively taking them outside of the direct supervision of the council's licensing team. For some time, our local community association has been asking the University of Warwick and the CCC Licensing Authority to verify the actual number of properties being occupied as student accommodation (UoW records) and the number of HMO licenced properties on the CCC records. Only then will it be fully evident of the scale of HMO concentration in the local area.</p>	6	Evidence base Other
HMO/117	Mrs Joscelyne Bigham				<p>This approach is reasonable; however, there is a concern that some issues may be displaced to other areas as property developers seek to avoid Article 4 Direction. For example, there are streets within Longford which have housing similar to that described as 'small (three bedroom) terraced dwellings' and some are already HMOs. With its good transport connections and lower property values than in some other wards, Longford could easily become a target. Could Longford be added so this could be avoided?</p>	2	A4D Miscellaneous Policy HMO1 Homes in Multiple Occupation Support

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HMO/121	Cheryl Revill				Cannon Park Estate and Cannon Hill Road area are not mentioned at all in this document and have an ever increasing number of HMO properties and a large number of student accommodation.	2	Amenity Own experience
HMO/125	Mr Paul Newman				I believe the approach is correct. We need to have defined areas where permitted development is withdrawn for conversions to HMOs. We then need to back this up with solid planning rules which support the acceptance/rejection of any application. In the past we have seen applications being rejected by Coventry City Planning but these decisions have then been appealed to the National Inspectorate and overturned. We need new planning policies which are put in place in respect of all HMOs, i.e. smaller HMOs as well as larger HMOs.	2	Policy HMO1 Homes in Multiple Occupation Support
HMO/152	Philip Cowen				Yes, I agree the approach is reasonable. However, I am concerned that further houses could be converted before Autumn 2023 and that the approach does not help the situation that has been allowed to develop up to this point. Can the council require owners of existing HMOs looking to sell their properties convert them back into whole houses before doing so?	5	Key Issues Support
HMO/175	Mr David Cass				Q2. – This question is not clear, is it asking whether the proposals set out in draft policy HMO1 are reasonable? If so, yes.	5	Other Policy HMO1 Homes in Multiple

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							Occupation
HMO/185	Mrs Jillian Cass				Q2. – This question is not clear, is it asking whether the proposals set out in draft policy HMO1 are reasonable? If so, yes.	5	Other Policy HMO1 Homes in Multiple Occupation
HMO/4	Rebecca Thompson				What happens to properties already converted without certain planning permissions? Will there be a map of all HMOs (small and large) so the impact can be seen? What happens if a property is just outside 100m? In terraced housing this could make a big difference so needs to be measured as a proportion of homes rather than meters say if a large detached property is measured by 100m	3	Other Policy HMO2 Concentrations and Thresholds Support
HMO/20	Miss Cathy Pallister				I agree with the above, I feel there should be a set limit to state that no further HMOs can be given a planning application - it is personal but with many of the HMOs in my area, the whole fabric of the building is being ripped out, floors dropped to accomodate more rooms. These properties will never be returned to 'normal' domestic use - it is a shame as these Victorian houses are being ruined.	1	Policy HMO2 Concentrations and Thresholds Support
HMO/29	None (Ms Janet Dixon)			None	I support this approach.	4	Policy HMO2 Concentrations and Thresholds

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							Support
HMO/39	Mr Keith Struthers				The 100 m/thresholds rules should have been applied to Cannon Park estate and the Cannon Hill Road area from the outset. In roads such as Aldrin Way, precious adjacent family bungalows have been converted to HMOs with no consideration of the consequences to the remaining community. Article 4 Direction introduction in 2011 could have prevented this irrevocable loss of family homes if these rules and Council Planning policies had been applied.	7	A4D Miscellaneous Own experience
HMO/49	Madelein Struthers				For Cannon Park Estate (CPE) the above concentration and thresholds have been exceeded in so many situations. All these criteria and policies need to be applied, along with Article 4 Direction.	8	A4D Miscellaneous Policy HMO2 Concentrations and Thresholds Support
HMO/59	N/A (Mr Andrew McIntosh)			N/A	In General terms the proposal to limit HMOs is sensible, with the need to planning permission for small HMOs ensuring that adequate thought is given to the impacts on neighbourhoods. The criterion proposed of 10% of residences within a 100m radius may well be work efficiently for areas of denser housing such as terraced neighbourhoods, however this approach may well become a significant restriction when considered for areas which have less property density.	1	Policy HMO2 Concentrations and Thresholds Support

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					<p>For instance taking Wainbody as a example:</p> <p>This area contains a significant proportion of Semi-detached and detached housing many of which enjoy sizeable plots with off street parking. It is quite possible that the 10% criterion within a 100m radius would involve no more than 2 (or potentially 1) property being considered and so effectively equates to a 'ban' on all proposals in the areas that are best able to cope with the development. It would seem that applying the criterion on an entire ward level would not adequately take into account the differing nature property density both within wards and across the city.</p>		
HMO/64	Ms Clair Henrywood				<p>I disagree with this as you are still providing the chance for an area to go over 10% - which is still too high a proliferation of hmos. You need to be tougher and stop the proliferation of hmos in residential areas.</p>	2	Object Policy HMO2 Concentrations and Thresholds
HMO/69	Mr Jon Hodge				<p>A concentration of 3% (5% max) for Moreall Meadows (Wainbody ward) would seem appropriate. There are some HMOs here that have caused some problems. The development is next to the university and as a family / older person area the mix / noise from students isn't appropriate. There is a parking restriction for on road parking too, meaning there is a practical</p>	4	Other Policy HMO2 Concentrations and Thresholds

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					limit to the number of cars that can be accommodated on drive ways.		
HMO/100	Mrs Debbie Williams				We are well over 10% concentration in the Cannon Park area so hopefully this proposal would mean no further conversions of use allowed.	3	Policy HMO2 Concentrations and Thresholds Support
HMO/109	Mr David Swanson				<p>The proposal set out in Draft Policy HMO2 is supported and will be effective at preventing over concentration of HMOs in mixed residential areas, although it would better if the policy was explicit about situations where the existing concentration is greater than 10% as is the case in the Cannon Park Estate (currently greater than 40% and in parts greater than 80%). It is also critical that the application of the policy and the assessment of concentrations are implemented consistently.</p> <p>The effectiveness of the policy will also be dependent on ensuring robust and effective enforcement supports the planning process. There is a worrying trend recently that sees developers starting, or indeed completing, works to convert and extend properties for HMO use before applying for planning permission, and relying the submission of a retrospective planning application to cover the works when options are frequently seen as more limited. To prevent developers attempting to circumnavigate the planning</p>	8	Policy HMO2 Concentrations and Thresholds Support

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					process, swift and effective enforcement will be required and, where necessary, positive action taken to force reinstatement of the property is planning approval cannot be granted due to non-compliance with the Article 4 Direction and/or the associated HMO policies.		
HMO/126	Mr Paul Newman				This is a clear policy and will stop any more HMOs being converted in our area as we already exceed this.	3	Policy HMO2 Concentrations and Thresholds Support
HMO/135	Mr Ian Stevenson				HMO applications that take the HMO concentration over the 10% threshold within 100m should also not be supported. This should also apply to non-campus PBSAs that are within 100m of residential properties.	2	Object Policy HMO2 Concentrations and Thresholds
HMO/153	Philip Cowen				Accurate data is essential for this to work. Thinking about Craven Street and surrounds I'm sure the concentration is already higher than 10% within 100 metres. How is the council going to ensure all HMOs are registered and known about to ensure this can be accurately applied?	6	Evidence base Support
HMO/166	CARTA (Miss Sian Thuraisingam)			CARTA	We agree that HMO thresholds should be in place. This provides	4	Policy HMO2 Concentrations and Thresholds

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					clear criteria which will be used to reject future HMO planning applications. In our area we believe the 10% level would prevent any further conversions given the number and location of existing HMOs.		Support
HMO/5	Rebecca Thompson				Could be dangerous if use the same rule for the ward and not in area pockets. For example, Charterhouse, which borders my area in lower Stoke, has many and my area is increasing, yet other areas of lower Stoke have few as they are further from town	4	Other Policy HMO2 Concentrations and Thresholds
HMO/16	Leah Tardivel				Why don't you want to reduce HMO numbers? Some areas just aren't suitable for HMO's. If HMO's are a valuable form of housing why aren't they being included in new build estates specifically designed to accommodate the parking and space needs? Why are they being left to squeeze into areas that just don't have the space to accommodate the infrastructure they need?	4	Other Policy HMO2 Concentrations and Thresholds
HMO/30	None (Ms Janet Dixon)			None	Yes this approach is reasonable.	5	Policy HMO2 Concentrations and Thresholds Support
HMO/50	Madelein Struthers				All criteria and policies cited must be applied to protect Cannon	9	Policy HMO3 Sandwiching Support

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					Park Estate, along with Article 4 Direction.		
HMO/70	Mr Jon Hodge				<p>Yes, I support the introduction of the article 4 proposal, but would reduce the concentration to say 5% for areas that adjoin universities to encourage students to use the purpose built accommodation or live in areas where there are appropriate student facilities</p>	5	A4D Miscellaneous Other Policy HMO2 Concentrations and Thresholds
HMO/91	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p>This question relates to the <b>Draft Policy HMO-02 (Concentrations and Thresholds)</b> which seeks to limit the concentration of HMOs in any one area by use of thresholds, these being:</p> <p>a) Where there is an existing HMO concentration of 10% or more of all dwellings within 100m radius of the centre point of an application property, HMO applications will not be supported; and</p> <p>b) Where there is an existing HMO concentration of less than 10% within 100m radius of the centre point of the application property, HMO applications will be considered against the other Policies in this DPD and all other relevant policies.</p> <p>The reasoned justification (paragraph 5.10) states that '<i>For</i></p>	3	Other Policy HMO2 Concentrations and Thresholds Support

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					<p><i>neighbourhoods which exceed the threshold, no further applications to a C4 HMO dwelling, generated by the withdrawal of change of use permitted development rights would be permitted</i>'. This is a clear policy intent; however the policy wording is not as explicit, stating only that the application would not be 'supported' – it is suggested that the policy wording could be strengthened in line with the reasoned justification to state would not be 'permitted'.</p> <p>The CCWMP acknowledges the commentary with regards to 'exceptional circumstances' that may apply (DPD, paragraph 6.4) but notes that there is no provision for these within the wording of Draft Policy HMO-02, which we suggest is the most appropriate of the Draft Policies as the first filter of whether an HMO would be acceptable in principle.</p> <p>The CCWMP supports the principle of Draft Policy HMO-02, subject to the suggested amendments, which would serve to prevent the over-concentration of HMOs within an area and thereby reduce the potential for crime and disorder and to enhance community safety.</p>		
HMO/110	Mr David Swanson				<p>Whilst the implied link between HMO shared student housing and purpose built student accommodations set out in para 5.9 is not unreasonable, the recent construction and opening of the very large PBSA adjacent to Cannon Park Shopping Centre does not</p>	9	General Observation Statistical evidence

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					<p>seem to have resulted in any significant reduction in the conversion of family homes to HMOs on the Cannon Park Estate, despite assurances given during the Planning Committee consideration of the original PBSA submission. Where communities are hosting these PBSAs within their neighbourhood, the impact of these should also be a factor in assessing the suitability of further HMOs in the locality. A 800 room accommodation immediately adjacent to the Cannon Park Estate has its own impact on the demographics and diversity of the local community in situations such as places of worship, doctors and medical facilities, local retail shopping facilities, etc., and as such, should form part of the consideration of HMO applications in the future.</p> <p>The reference in para 5.11 to effectively blocking further C4 dwelling applications in areas which exceed the stated threshold is welcomed in the case of Cannon Park Estate and potentially in parts of the Cannon Hill Road locality although due consideration needs to be taken if the effect of such a policy leads to potential loss of value of properties in the area due to them become unsaleable as a result of the existing concentration of HMOs causing private buyers to focus their property searches elsewhere.</p>		
HMO/127	Mr Paul Newman				<p>This is policy reasonable and relevant. It will provide a clear rule to ensure that HMOs are not concentrated in certain areas and causing further imbalances.</p>	4	Policy HMO3 Sandwiching Support

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HMO/144	Mr Philip Bywater				<p>The proposals set out in draft policy HMO2 (HMO concentration and thresholds) are reasonable, however the threshold provision requires expansion, as follows:-</p> <p>As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should also be a further layer of control so that the 10% figure should not be exceeded within a 500 metre radius. This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.</p>	5	Other Policy HMO2 Concentrations and Thresholds Support
HMO/154	Philip Cowen				I think it is relevant and reasonable. However, whether it addresses the issues is another story because of the number of properties already developed as HMOs. Maybe this policy in conjunction with policies to rejuvenate areas would work best.	7	Other Policy HMO1 Homes in Multiple Occupation Support

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HMO/176	Mr David Cass				<p>Q3. - The proposals set out in draft policy HMO2 (HMO concentration and thresholds) are reasonable, however the threshold provision requires expansion, as follows:-</p> <p>As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should also be a further layer of control so that the 10% figure should not be exceeded within a 750 metre radius (but would not apply to any residential accommodation provided within the university campuses themselves). This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.</p>	6	Other Policy HMO2 Concentrations and Thresholds Support
HMO/186	Mrs Jillian Cass				<p>Q3. - The proposals set out in draft policy HMO2 (HMO concentration and thresholds) are reasonable, however the threshold provision requires expansion, as follows:-</p>	6	Other Policy HMO2 Concentrations and Thresholds Support

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					<p>As this paper acknowledges, there are a number of areas within the city where harmful concentrations of HMOs already exist. The proposal to trigger the requirement for a planning application, where ‘the introduction of a new HMO would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property’, would do little or nothing to help these areas. Therefore, there should also be a further layer of control so that the 10% figure should not be exceeded within a 750 metre radius (but would not apply to any residential accommodation provided within the university campuses themselves). This would help to avoid specific areas of the city continuing to be saturated with HMOs and mitigate the unacceptable position that has been allowed to develop. Surely the objective is to ensure that the city as a whole, should not exceed the appropriate level of HMOs and thus prevent the creation of those issues raised in this consultation and past mistakes.</p>		
HMO/22	Miss Cathy Pallister				<p>This sandwiching is something that concerns me greatly, I already have HMSOs adjacent, behind and opposite me. Once my elderly neighbour is no longer here, I feel it will be sold to a developer, I will then feel totally surrounded by such properties, this is a big worry for residents that own their own homes</p>	3	Amenity Own experience Policy HMO3 Sandwiching Support

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HMO/31	None (Ms Janet Dixon)			None	This is very important. Sandwiching is a real issue causing distress for those affected.	6	Policy HMO3 Sandwiching Support
HMO/51	Madelein Struthers				On Cannon Park estate (CPE) sandwiching has been exceed in so many areas, it is astonishing. Such criteria were never considered by Planning Committee.	10	
HMO/61	N/A (Mr Andrew McIntosh)			N/A	It would appear 'Sandwiching' is only relevant to high density housing areas. This should not be a consideration for lower density areas.	2	Other Policy HMO3 Sandwiching
HMO/71	Mr Jon Hodge				Agree	6	Policy HMO3 Sandwiching Support
HMO/108	Mr David Swanson				The policy proposals set out in Draft Policy HM03 are supported. The fact that the policy suggests that no more than a one in four HMO concentration within a single street would seem to be a reasonable balance between the need to protect the local residents amenity and the need for providing HMO based accommodation.  As previously stated, these policy provisions are perhaps too late to protect against the impact of over intensification of HMOs in	7	Policy HMO3 Sandwiching Support

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					the Cannon Park Estate community but should protect against further intensification going forward, so long as the policy is consistently applied.		
HMO/128	Mr Paul Newman				This is a clear policy.	5	Policy HMO3 Sandwiching Support
HMO/129	Mr Paul Newman				This is a clear policy. It will hopefully ensure that there is a more even balance of property types in an area	6	Policy HMO3 Sandwiching Support
HMO/155	Philip Cowen				I agree with this and other possible combinations.	8	Policy HMO3 Sandwiching Support
HMO/167	CARTA (Miss Sian Thuraisingam)			CARTA	We also agree that sandwiching should be considered as part of planning criteria. Again, this is clearly defined and we believe that this will ensure an appropriate balance of housing. We believe a number of properties operating as HMOs would not have been allowed under this criteria if Article 4/this DPD had already been in place at time of conversion.	5	Policy HMO3 Sandwiching Support
HMO/23	Miss Cathy Pallister				I feel the policy approach is reasonable regarding sandwiching	4	Policy HMO3 Sandwiching Support

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HMO/52	Madelein Struthers				On Cannon Park Estate at a HMO rate of 40%, the amenity of neighbouring residents is compromised in so many areas. It has to STOP. Article 4 must be made part of that process.	11	A4D Miscellaneous
HMO/92	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p>This question relates to the <b>Draft Policy HMO-03 (Sandwiching)</b> which seeks to prevent an over concentration of HMOs, specifically by avoiding non-HMO dwellings being sandwiched between two HMOs or a continuous frontage of three or more HMOs, and defines sandwiching as including:</p> <ul style="list-style-type: none"> <li>a) Up to three single residential properties in a street located between two single HMO properties;</li> <li>b) Single HMO properties in any two of the following locations: adjacent, opposite and to the rear of a single residential property;</li> <li>c) A residential flat within a sub-divided building where the majority of flats are HMOs;</li> <li>d) A residential flat within a sub-divided building in a street located between two other sub-divided buildings with at least one HMO flat in each building;</li> <li>e) A residential flat within a sub-divided building located between two flats above and below; and</li> </ul>	4	Policy HMO3 Sandwiching Support

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					<p>f) A residential flat within a sub-divided building located between two HMO flats on both sides.</p> <p>CCWMP supports the principle of Draft Policy HMO-03 and consider this would serve to prevent the over-concentration of HMOs at the neighbourhood/street level, as affecting individual residents, supporting a better balance and integration of HMO occupancy within a residential area, reduce the potential for crime and disorder, and enhance community safety.</p>		
HMO/111	Mr David Swanson				<p>The proposed approach to sandwiching is supported and should provide the means to prevent over intensification of HMOs in a specific street, if it is applied consistently.</p>	10	Policy HMO3 Sandwiching Support
HMO/130	Mr Paul Newman				<p>This is policy reasonable and relevant. It will help to ensure that there a balance of properties in the given area.</p>	7	Policy HMO3 Sandwiching Support
HMO/156	Philip Cowen				<p>Yes, I agree with this approach. Many residents who are unable to move will undoubtedly feel apprehensive and concerned about adjacent houses being converted to HMOs. This is especially true of older residents and those that cannot afford or don't want to move out of the area they may have lived in for a long time.</p> <p>Maybe the policy could ask how a developer plans to minimise</p>	9	Amenity General Observation Policy HMO1 Homes in Multiple Occupation Support

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					the disruption to immediate neighbours not only while a property is being developed but once occupied as an HMO. The developer should be required to meet with the neighbours to share their views.		
HMO/177	Mr David Cass				Q4. - The proposals set out in draft policy HMO3 (HMO sandwiching) are reasonable.	7	Policy HMO3 Sandwiching Support
HMO/187	Mrs Jillian Cass				Q4. - The proposals set out in draft policy HMO3 (HMO sandwiching) are reasonable.	7	Policy HMO3 Sandwiching Support
HMO/6	Rebecca Thompson				Great, but again, those properties already recently converted with bins constantly on the pavement and wrong things in them? What action will be taken ?	5	Policy HMO4 Amenity and Design Support
HMO/24	Miss Cathy Pallister				Refuse bins are a massive issue so I agree with the refuse part above, it should be mandatory	5	Amenity General Observation Policy HMO4 Amenity and Design Support

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HMO/32	None (Ms Janet Dixon)			None	I agree with the criteria listed above.	7	Policy HMO4 Amenity and Design Support
HMO/40	Mr Keith Struthers				For the Cannon Park/Cannon Hill road area, the concern expressed by home owning residents about their experience with refuse bins and refuse disposal was never addressed at Planning committee meetings. Apart from concerns of these residents, there is indifference to the state of some HMO areas. This needs to be rectified.	8	Amenity Own experience Policy HMO4 Amenity and Design Support
HMO/53	Madelein Struthers				On Cannon Park Estate, one of the main problems that local residents face is the state of refuse bins at HMOs. This is often unacceptable, This consequence is ignored by Planning Committee.	12	Amenity Amenity General Observation Own experience
HMO/62	N/A (Mr Andrew McIntosh)			N/A	<p>Points (a) to (f) would seem to sensible criterion, but could be subject to significant amount of interpretation. Impacts on “amenity” and “character” are very subjective. It is simply too prescriptive to assume that higher numbers of residents will lead to impacts of “activity, noise and disturbance”.</p> <p>HMOs are an important and necessary part of the housing mix, and this policy should not seek to discriminate against those who</p>	3	Policy HMO4 Amenity and Design Support

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					they legitimately serve through the imposition of ‘NIMBY’ like criterion.		
HMO/72	Mr Jon Hodge				Suggest parking is specifically included as a criteria.	7	Other Policy HMO4 Amenity and Design
HMO/112	Mr David Swanson				The proposals contained within Draft HMO4 are supported, subject to them being applied consistently and being robustly enforced through the planning process, including internal inspection where necessary to confirm the application of planning proposals as submitted.  As mention previously in these comments, the need for effective management of waste is of particular importance. The simple provision of refuse bin storage does not resolve the problem of mismanagement of waste in many HMO properties. There is a need to link waste management obligations to an effective HMO licencing regime with appropriate sanctions and penalties is required to ensure waste is better managed than is the case today at many properties.	11	Policy HMO4 Amenity and Design Support
HMO/118	Mrs Joscelyne Bigham				Could the following be considered for adding to the criteria for amenity and design?	3	Other Policy HMO4 Amenity and

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					<ul style="list-style-type: none"> <li>Secure facilities for receiving post. The HMO on the corner of Woodshire's Road and Wilson's Lane has fittings placed onto a boundary fence lining the street. Is this acceptable?</li> <li>Placement of additional pipes, satellite dishes and wiring on the outside of the building especially on street frontages.</li> <li>Sensitive use of building materials for creating extensions or conversion of public houses/shop frontages. The Old Crown on Windmill Road is a good example of where the developer has carefully selected materials to match the original design and use of the building. The HMO on the corner of Woodshire's Road and Wilson's Lane illustrates the opposite. There are different types of bricks laid in different patterns (running vs Flemish bond), different cornicing/eaves, different style and size of windows (including lintels and ledges), etc.</li> <li>Parking spaces marked out for each resident. These spaces should be large enough for taxi cabs and vans which residents may need to use for work.</li> <li>Provision for residents to be able to store food and cook on the premises.</li> <li>Provision of laundry facilities for residents to wash and dry their clothes on the premises (including secure outdoor areas).</li> <li>Modern heating systems and use of insulation.</li> </ul>		Design

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					<ul style="list-style-type: none"> <li>• Fire alarms, doors and exits.</li> <li>• Security features such as building access, CCTV, lighting, windows, locks, etc.</li> <li>• Details of landscaping where there are gardens and/or plans for provision/contribution towards public open space within the wider area.</li> </ul>		
HMO/131	Mr Paul Newman				<p>The character of our area has changed because of the number of HMOs and the transient nature of the tenants.</p> <p>Our area does not have the capacity to accept anymore conversions and the additional parking needs relating to the larger number of people in a property.</p>	8	Amenity Own experience
HMO/136	Mr Ian Stevenson				Travel routes - including cycling and pedestrian - should not adversely affect existing areas. This is especially true of PBSAs that are located close to residential areas and may generate through traffic, including anti-social behaviour in the evenings.	3	Amenity General Observation
HMO/157	Philip Cowen				Agree with these. Also, it should not be possible to convert a house to an HMO near places of entertainment such as pubs and venues as this could subsequently threaten the businesses existence if complaints about noise were forthcoming.	10	Policy HMO4 Amenity and Design Support

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HMO/168	CARTA (Miss Sian Thuraisingam)			CARTA	<p>We agree with the above policy. The points of particular relevance to the CARTA area are:</p> <ol style="list-style-type: none"> <li>1. b) impact of HMOs on the character of our conservation area</li> <li>2. e) adequate vehicular and cycle parking – parking is on street and the frontages of properties are very narrow – the area cannot support the cumulative effect of the additional number of tenants in HMOs</li> </ol>	6	Policy HMO4 Amenity and Design Support
HMO/7	Rebecca Thompson				<p>With limited powers, this approach seems most sensible than relying on the local plan which is already out of date and cannot control what is done with existing housing stock</p>	6	Other Policy HMO4 Amenity and Design Support
HMO/41	Mr Keith Struthers				<p>In addition to an introduced Article 4 Direction, everything must be done to protect the previous character of the neighbourhood. 6 room HMOs have been converted, with extremely unsightly black waste pipes installed on the outside of what was previously an external lounge wall, in view of an immediate neighbouring property. Article 4 Direction with proper Planning Committee review could have rejected this development.</p> <p>None of this is mentioned in the Iceni report</p>	9	A4D Miscellaneous Policy HMO4 Amenity and Design Support

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HMO/54	Madelein Struthers				On Cannon Park Estate, introduction of Article 4 Direction must work in conjunction with CCC policies, NPPF, correct use of thresholds and sandwiching to do something to curtail the unacceptable situation here.	13	A4D Miscellaneous
HMO/73	Mr Jon Hodge				I would make the restrictions for concentration of HMOs in the areas near / next to the universities more restrictive to redirect the risk of further HMO growth into surrounding areas.	8	Other Policy HMO4 Amenity and Design Support
HMO/80	The Coventry Society (Mr John Payne)			The Coventry Society	Yes I feel that the policy might bring these problems under control.	6	Policy HMO4 Amenity and Design Support
HMO/93	West Midlands Police (Mrs Maureen Reidy)	Tyler Parkes (Amanda Stobbs)	Tyler Parkes	West Midlands Police	<p>This question relates to the <b>Draft Policy HMO-04 (Amenity and Design)</b> which sets out the criteria by which applications for HMOs will be assessed, comprising:</p> <ul style="list-style-type: none"> <li>a) The premises are suitable for a full or part conversion in terms of location and size for the number of households to be accommodated;</li> <li>b) There would be no demonstrably adverse impact on the amenity of neighbouring properties and character of the surrounding area in particular through increased activity, noise or</li> </ul>	5	Other Policy HMO4 Amenity and Design Support

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					<p>disturbance;</p> <p>c) The configuration of internal sleeping accommodation space satisfactorily takes into account minimum room size requirements* and light and ventilation;</p> <p>d) The use of acoustic insulation to protect neighbouring and adjacent properties through appropriate party wall insulation;</p> <p>e) The design of external space is safe and secure, and includes provision for refuse storage, washing facilities and adequate vehicular and cycle parking <sup>(3)</sup> and ensures access to outdoor amenity space; and</p> <p>f) Refuse bin storage is provided externally within the curtilage of the property, within suitably designed structure and the refuse bin not visible form the public realm.</p> <p><i>* 6.51m<sup>2</sup> for one person over ten years of age, 10.22m<sup>2</sup> for two persons over ten years of age and 4.65m<sup>2</sup> for one child under the age of ten years. Any room of less than 4.64m<sup>2</sup> must not be used as sleeping accommodation <sup>(4)</sup>.</i></p> <p><i>Footnote (3) refers to the standards in the adopted Local Plan 2011-2031</i></p>		

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					<p><i>Footnote (4) refers to figures based on the City Council's HMO Licencing Standards</i></p> <p>Whilst the CCWMP is supportive of the design considerations expressed within Draft Policy HMO-04 concerns are raised that there is no explicit reference to the need for HMOs to meet the 'Secured by Design' standards. Secured by Design is the official UK Police Service initiative, the adoption of which improves the security of building and their immediate surroundings and covers a range of relevant matters including layout, dwelling boundaries, rear access footpaths, climbing aids, vehicle parking, cycle storage, planting, entry management, windows, lighting as well as CCTV and door entry systems.</p> <p>Secured by Design (SBD) and Designing Out Crime (DOC) are the most sustainable and therefore the most cost-effective of all crime reduction interventions, with little or no evidence of displacement of crime and far more likely to lead to benefits to surrounding areas.</p> <p>Over the past two decades, independent, academic assessments have demonstrated that developments which attain the Secured by Design (SBD) award maintain long term, sustainable reductions in recorded crime. The CCWM's flagship project, 'The Four Towers' at Duddeston Manor, in nearby Birmingham has maintained a 98.7% reduction (as based on the figures for 1988) in domestic burglary for over 20 years, whilst reductions in other</p>		

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					<p>property crime categories replicate the research findings of Armitage and others, some of which are listed below:</p> <ul style="list-style-type: none"> <li>• Dr Rachel Armitage in 1999 found 50% fewer burglaries and 25% fewer vehicle crimes and criminal damage reports;</li> <li>• Glasgow Housing Corporation project refurbishing to SBD standards resulted in 65% burglary reduction;</li> <li>• Armitage R and Monchuk L in 2009 re-evaluated previous research and researched new SBD sites and found burglary levels in original SBD sites (1999) were 62% down, and burglary levels in the newest SBD developments were 75% down.</li> </ul> <p>Most recently, Police Scotland's Stuart Ward showcased the success of SBD in Scotland at a National Training Event in 2019, where he reported an 87% reduction in crime in SBD properties in East Central Scotland over the last 18 years based on a study in the Fife area. This study analysed data from more than 150 Kingdom Housing Association developments and showed a significant drop in crimes on the SBD developments compared to non-SBD developments between 1997 and 2015. The study showed that the 3,000 homes built to the SBD standard have had 87% fewer crimes recorded.</p> <p>At least seven evaluations of SBD have all found greatly reduced crime levels. Policies which support the need for development to</p>		

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					<p>be SBD would accord with the requirements of the NPPF.</p> <p>The ‘broken windows theory’ links disorder and incivility within a community to subsequent occurrences of serious crime. Any visible signs of crime and civil disorder, such as broken windows, vandalism, loitering, public drinking, and transportation fare evasion, can create an urban environment that promotes even more crime and disorder. (Wilson &amp; Kelling, 1982).</p> <p>The CCWMP has evidence that where there is a lack of maintenance, this can quickly lead to a spiral of decline/neglect if not addressed quickly and effectively. The CCWMP believes the need to design out crime and ensure its continued maintenance in all new developments and redevelopments is a cornerstone to successful sustainable communities including with HMO properties.</p> <p>Examples of crime prevention initiatives of particular relevance to HMO developments include the need for:</p> <ul style="list-style-type: none"> <li>• Adequate lighting for internal and external communal areas and access(es).</li> <li>• Doors into internal private spaces to be of external access door standard to provide safe and secure areas for individuals in their homes reducing opportunities for theft, intimidation, violence, disorder and fear of crime.</li> <li>• Controlled and regulated access into the properties,</li> </ul>		

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					<p>including into any separate buildings within the shared communal outdoor space to reduce the risk of unauthorised entry with associated opportunities for crime.</p> <p><b>The CCWMP formally requests that explicit reference is made within the Policy HMO-04 to:</b></p> <ul style="list-style-type: none"> <li>• <b>The need to consult with Design Out Crime Officers (DOCO) at the pre-application and planning application stage;</b></li> <li>• <b>The need for all proposals to meet Secured by Design principles; and</b></li> <li>• <b>The need for a management plan which specifically addresses the need for crime prevention measures to be maintained.</b></li> </ul> <p>The CCWMP is concerned that HMO can provide an unsafe environment for residents within these developments if they fail to meet SBD Standards and/or if they are not properly maintained to a standard which will reduce the risk of crime, antisocial behaviours, and the fear of crime.</p> <p>In addition, (and as noted under Question 2) we note that there is some duplication / cross-over between Draft Policy HMO-01 and Draft Policy HMO-04. We consider to be unnecessary and could lead to conflicts should the relevant referenced standards become</p>		

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					<p>out of sync, reducing the weight afforded to either policy.</p> <p>It is suggested this could be avoided by integrating the requirements of HMO-01 into HMO-04, specifically with regards to:</p> <ul style="list-style-type: none"> <li>a. The appropriateness of the location – the specifics in respect of the accessibility to local services and public transport could be integrated into Policy HMO-04 point (a).</li> <li>b. The living standards of future occupiers – the reference to the emerging Accessible Homes standards or its future equivalent could be integrated into Policy HMO-04 point (c), although see note below.</li> <li>c. The protection of residential amenity in respect of character, appearance, highway safety and parking – the specifics of which could be integrated into Policy HMO-04 points (b), (e) and (f) as appropriate.</li> </ul> <p>The explicit space standards as referenced within this Policy, (i.e., footnote *) are also questioned, noting that the m<sup>2</sup> areas are less than those expressed within the Nationally Described Space Standards (DCLG, March 2015) which require that: '<i>c) in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m<sup>2</sup> and is at least 2.15m wide</i>' and '<i>d). in order to provide two bedspaces, a double (or twin bedroom) has a floor</i></p>		

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					<p><i>area of at least 11.5m<sup>2</sup></i>'. This could lead to unsatisfactory living accommodation, with subsequent effects on the health and well-being of individuals and thereby their future potential.</p> <p>Accordingly, the CCWMP supports the principle of Draft Policy HMO-04, subject to the inclusion of the requirement for HMOs to meet the Secured By Design standards, and considerations as set out above. It is considered that these amendments would deliver an improved quality of accommodation and include specific measures to reduce the potential for crime and disorder and to enhance public safety.</p>		
HMO/113	Mr David Swanson				<p>The justification provided is reasonable and probably supports the draft policy in so far as it can.</p> <p>The issue of management of waste has already been discussed in these comments. Similarly, the maintenance of HMOs has also cause for concern, particularly the too frequent absence of front garden maintenance on Cannon Park Estate properties. Once again, the need to ensure appropriate maintenance is carried out to an acceptable standard should be part of the HMO Licensing regime with suitable penalties for failure to comply. This is particularly important where HMOs are mixed with owner occupier properties as poor property and garden maintenance can directly affect the look, feel and amenity benefit of adjacent</p>	12	Amenity General Observation

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					properties.		
HMO/132	Mr Paul Newman				This is policy reasonable and relevant. The implications of increased parking need should be considered.	9	Policy HMO4 Amenity and Design Support
HMO/158	Philip Cowen				Yes, the council should continue to work with the universities to help educate students on their responsibilities when living in HMOs in the community. The purpose built student accommodation is extremely expensive and I have no doubt that students may start opting to live in HMOs instead in greater numbers.	11	Key Issues Support
HMO/178	Mr David Cass				Q5. - The proposals set out in draft policy HMO4 (amenity and design issues) are reasonable but there should be a minimum requirement for amenity/green space.	8	Policy HMO4 Amenity and Design Support
HMO/188	Mrs Jillian Cass				Q5. - The proposals set out in draft policy HMO4 (amenity and design issues) are reasonable but there should be a minimum requirement for amenity/green space.	8	Policy HMO4 Amenity and Design Support

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HMO/17	Leah Tardivel				Many of the properties in this area, while not HMOs are also short term lets. This will compound some of the issues. Electoral registers could help identify areas which are already lacking stability and where the effect of an extra HMO would be greater than inserting it into a more stable neighbourhood.	5	Assessment process Other
HMO/25	Miss Cathy Pallister				reasonable, but less HMOs is better in the longterm - trying to get more families into the area would help local communities	6	Assessment process Support
HMO/55	Madelein Struthers				The assessment process is reasonable, but should have been applied in its entirety at least a decade ago. There has been no application of thresholds, sandwiching which has led to the dramatic social degradation of the previous family orientated, cosmopolitan estate.	14	Assessment process Support
HMO/74	Mr Jon Hodge				Reasonable, allowing for the other criteria to be considered.	9	Assessment process Support
HMO/81	The Coventry Society (Mr John Payne)			The Coventry Society	Yes I think that the assessment process is reasonable and relevant in addressing the problems. However I am concerned about paragraph 6.4. Even if the neighbourhood is characterised by dominance of HMOs, further increase in such properties will only	7	Assessment process Other Support

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					make matters worse to the detriment of existing residents, including HMO tenants.		
HMO/114	Mr David Swanson				The assessment process proposed is broadly supported with the exception of para 6.4 which may potentially be applied in the case of Cannon Park Estate (>40% HMO concentration). The wording used in the case of Exceptional Circumstances is far too loose and open to interpretation. Even where the existing HMO concentration is high, each and every new proposal must be subjected to rigorous planning scrutiny and the views of local residents must be taken into account. The consideration of such proposals must include an assessment against each of the HMO policies and, if any policy is not being met a full justification for setting aside that policy must form part of the planning application documentation and be open to objection by affected neighbours and the local community.	13	Assessment process Other Support
HMO/120	Mrs Joscelyne Bigham				Could there also be a requirement for the following information to be submitted: <ul style="list-style-type: none"> <li>• Provision of toilets and washing facilities.</li> <li>• Location(s) for food storage and cooking facilities.</li> <li>• Laundry facilities and indoor/outdoor areas for clothes drying.</li> </ul>	4	Assessment process Other

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					<ul style="list-style-type: none"> <li>• Heating systems and access to hot water.</li> <li>• Position of fire alarms, doors and exits.</li> <li>• Building materials.</li> <li>• Security alarms, cameras and lighting.</li> </ul>		
HMO/133	Mr Paul Newman				<p>Within the process for counting HMOs you have included “Council tax records - student exemptions for council tax excluding purpose built student accommodation and private flats.” If there are properties which have student exemptions, don’t these require HMO licences (if they are “tenanted by 3 or more unrelated persons forming two or more households and sharing basic amenities”), i.e. wouldn’t they already be covered under other bullet points. If they have a student exemption and are operating as HMOs without a licence then I would expect that they would need to apply for planning permission.</p> <p>Section 6.4 ”exceptional circumstances”, must be reworded to provide a clear definition of “vast majority” in “This is because the vast majority of properties are already in HMO use”. It should have a defined percentage of properties and area as with Policy HMO2. If this section is reworded to provide clear definitions then this is appropriate - it should not provide a loop hole for developers to be able to convert properties, or for them to appeal to Planning Inspectorate.</p>	10	Assessment process Object

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HMO/159	Philip Cowen				Yes, this seems like a good starting point moving forward but it does not address existing areas with many HMOs already in place. Measures should be taken to improve these areas and where possible bring houses back into family use.	12	Amenity Assessment process General Observation Other
HMO/169	CARTA (Miss Sian Thuraisingam)			CARTA	<p><b>This part of the DPD is of concern.</b> Unlike the previous draft policies this is not specific. This exceptional circumstances section would provide a loophole for developers unless the “vast majority” criteria is clearly defined. At the very least we believe that there should be an automatic exemption from applying this rule if the HMO in question is in a conservation area.</p> <p><b>We strongly urge this wording to be changed.</b></p>	7	Assessment process Object
HMO/179	Mr David Cass				Q6. – The proposed assessment process is reasonable, with the exception of the proposals set out for ‘Exceptional Circumstances’. This is effectively ‘throwing the towel in’ and is totally unacceptable. The proposed policy, together with my proposed amendment to concentrations, should be applied fully and without exception.	9	Assessment process Object
HMO/189	Mrs Jillian Cass				Q6. – The proposed assessment process is reasonable, with the exception of the proposals set out for ‘Exceptional	9	Assessment process Object

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					Circumstances'. This is effectively 'throwing the towel in' and is totally unacceptable. The proposed policy, together with my proposed amendment to concentrations, should be applied fully and without exception.		

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