

Coventry City Council Homes in Multiple Occupation (HMO) Development Plan Document (DPD) Regulation 22: Consultation Statement

August 2023



Contents

| 1. | Introduction | 3 | | |
|-----|----------------------------------------------------------|----|--|--|
| | Consultation Approach | | | |
| 3. | Issues and Preferred Option – Regulation 18 | 6 | | |
| 4. | Publication – Regulation 19 | 15 | | |
| Арр | endix 1- Regulation 18 Press notice | 21 | | |
| Арр | Appendix 2 – Regulation 18 Summary leaflet | | | |
| Арр | Appendix 3 – Regulation 18 Comments form | | | |
| Арр | Appendix 4 – Regulation 18 Social media analytics report | | | |
| Арр | Appendix 5 – Regulation 19 Social media analytics report | | | |
| Арр | Appendix 6 - Regulation 18 responses report | | | |

1. Introduction

1.1 This Statement has been prepared to support the submission of the Homes in Multiple Occupation (HMO) Development Plan Document (DPD), in accordance with Regulation 22 (1) (C) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Statement is a statutory requirement for a Local Planning Authority in the process of submitting a DPD to the Secretary of State. It outlines how the Council has complied with government requirements, in line with Regulations 18 and 19.

1.2 Regulation 22 requires a statement setting out:

(i) which bodies and persons the local planning authority invited to make representations under regulation 18,

(ii) how those bodies and persons were invited to make representations under regulation 18,(iii) a summary of the main issues raised by the representations made pursuant to regulation 18,

(iv) how any representations made pursuant to regulation 18 have been taken into account;

 $\left(v\right)$ if representations were made pursuant to regulation 20, the number of representations

made and a summary of the main issues raised in those representations; and

(vi) if no representations were made in regulation 20, that no such representations were made;

1.3 The statement sets out how Coventry City Council (the Council) has involved the community and stakeholders in preparing the Draft Submission HMO DPD and how this meets the requirements set out in the Council's Statement of Community Involvement (2021) and national Regulations.

1.4 The report provides information on the following:

- An overview of the Council's engagement activities, across all individuals, groups and stakeholders during each stage of the Local Plan making process, including which bodies and persons were invited to make representations under regulation 18 and 19.

- Which engagement activities where used during each stage of the Local Plan making process (both informal and formal).

- How individuals, groups and stakeholders were invited to make representations to inform the Local Plan process.

- A summary of the main issues raised by representations received through the engagement activities.

- How those main issues have been addressed in the local plan.

1.5 Table 1 shows the different stages of plan preparation leading up to the publication of the Submission Plan.

| Table 1: HMO DPD | consultation stages |
|------------------|---------------------|
|------------------|---------------------|

| Date | Consultation Stage |
|----------------|--------------------------------------|
| September 2022 | Issues and Preferred Option (Reg 18) |
| March 2023 | Publication (Reg 19) |

1.6 The Consultation Statement will assist the Inspector at the Examination in determining whether the Councils 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. The report also shows that public involvement was carried out following the approach set out in the Councils Statement of Community Involvement (SCI)¹.

¹ <u>https://www.coventry.gov.uk/downloads/file/37080/statement_of_community_involvement_july_2021</u>

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)².

2.2 The Council has a comprehensive consultation database of consultees, and other stakeholders including residents associations, parish councils, elected representatives, community and voluntary groups, developers and businesses, infrastructure providers, government agencies and individuals. Cross boundary consultation has been carried out with adjoining local authorities.

2.3 Persons or organisations wishing to be included on the Council's Local Plan consultation database can sign up via the Council's website and are able update their details. Stakeholders and the local community have been informed by email or in writing of opportunities to get involved in plan making, and given a variety of options for responding, including in writing, email and using the on line consultation portal.

2.4 A range of different approaches has been undertaken, including the following methods:

- Stakeholder meetings and briefings;
- Seminars and presentations;
- Conferences and workshops;
- Drop in sessions;
- Exhibitions at libraries;
- Emails/ letters to those on the Council's consultation database;
- Leaflets and posters;
- Press releases, media interviews and newspaper articles; and
- FAQ document.

2.5 The following chapters set out the consultations undertaken at each stage of plan preparation and further details on the consultation processes are set out in within the appendices of this statement.

² <u>https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/8</u>

3. Issues and Preferred Option – Regulation 18

3.1 This section shows how the Council carried out the Regulation 18 stage in accordance with Town and Country Planning (Local Development) (England) Regulations 2012. This states that a Consultation Statement must 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.

3.2 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).

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

Promotion of the consultation

3.4 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.
- Press notice was 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:
 - 5 separate tweets and Facebook posts on the Councils official social media accounts during the consultation period;
 - A bespoke post on the Councils YouTube channel which generated 507 views - <u>https://www.youtube.com/watch?v=ayTKcgwA5Hc</u>



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









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Consultation events and Hard to Reach Groups

3.5 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:

| Location | Date and Time |
|--------------------------------------|-----------------------------------|
| 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 |

3.6 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.

3.7 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

3.8 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 Inovem³, 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.

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

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

3.11 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.

3.12 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;

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

- 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

3.13 Overall, there were 190 comments received during the consultation via the Councils consultation management system⁴. A summary of the main issues raised included the following:

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.

3.14 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.

⁴ <u>https://coventrycitycouncil.inconsult.uk/HMO/consultationHome</u>

Option Selection

3.15 The key issues raised by respondents to the consultation are summarised in table 2 below. A comprehensive capture of all respondent comments can be found in Appendix 6.

| Respondent comments – summary of key issues | Officer response | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|
| General | | | | |
| - How are the number of HMOs calculated? | The number and distribution of existing HMOs is made through the following data sources: Council tax records – properties with student exemptions (excluding purpose built student accommodation and self-contained flats). Licensing records – properties licensed as an HMO. Planning records – properties with C4 or Sui | | | |
| | Generis planning consent or issued with a Certificate of Lawful Development. | | | |
| HMO1: Homes in Multiple Occupation | n | | | |
| The policy proposals set out in Draft Policy HM01 are supported. Increase in HMOs has led to an increase in vehicular parking and elderly individuals feeling isolated and lonely. Waste left on the public highways and noise being an issue at certain times of the day for existing residents. Huge changes to the appearance and feel of the areas that they live. | 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. | | | |
| HMO2: Concentrations and Threshol | ds | | | |
| General support for the policy. Concentrations are already exceeding 10% and the 100m distance threshold is generally supported. 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. | 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. | | | |

Table 2: Reg 18 Key Issues

| HN | HMO3: Sandwiching | | | |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| - | General support for the policy. Sandwiching only relevant to high density areas and consideration should be given to lower density areas. | 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. | | |
| HN | IO4: Amenity and Design | | | |
| - | General support for the policy. Need to make specific reference to 'Secured By Design' standards. Character of the neighbourhood can change due to HMO increases by way of increased vehicular parking on street and also green space provision should be insisted when HMO applications are made. | 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 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. | | |
| As | sessment Process | | | |
| - | General support to the approach. Para 6.4 is effectively 'throwing the towel in' and is totally unacceptable. 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. | 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. | | |

4. Publication – Regulation 19

4.1 Following consideration of representations on the Issues and Preferred Option and publication of the summary of representations in March 2023, work commenced on the Publication HMO DPD (Regulation 19). The evidence base which supported the HMO DPD was updated in relation to the Duty to Cooperate and Sustainability Appraisal. The above evidence combined with the previous consultation responses informed this stage of the consultation document.

4.2 In March 2023, the Councils Cabinet agreed to the publication of the HMO DPD publication document and associated evidence base documents for the purposes of public consultation with dates for public consultation to be confirmed as soon as reasonably possible. The Publication version consultation took place over seven weeks between March and May 2023. The document provided additional detail based on responses received to the Regulation 18 version held between September and November 2022.

4.3 The Council produced and published a standard representation form, guidance on how to make representations including the use of the online consultation system (Inovem consult). As part of the consultation, emails were sent to all stakeholders on the consultation database, including Duty to Cooperate partners. Documents were made available in local libraries and Council offices on request.

4.4 Publicity included use of corporate social media and press release explaining how to comment on the DPD which included six separate tweets on the Councils official social media accounts during the consultation period. The range of techniques used raised awareness of the consultation and the Council considers the consultation process fully met the requirements of the adopted SCI (20210 and is in accordance with the Town and Country Planning Regulations.

4.5 In total, 12 separate representations were received to the HMO DPD Regulation 19 consultation. Having regard to regulation 20 of the Town & Country Planning regulations 2012, the representations received together with the Councils (officer) responses form part of the suite of submission documents sent to the Planning Inspectorate. A summary of the main issues raised are set out in table 3 below.



Changes and limits to homes in multiple occupation (HMOs) are moving a step closer.

To find out more about our revised HMO Development Plans visit our website: orlo.uk/NyLdP



Landery Cary Canada

Coventry City Council @coventrycc · Apr 6 Our latest weekly newsletter is out now! •••





The final few @BJKCup tickets are left! Get yours now to see Great Britain v France at the @CBSArena.



4.6 As a result of the consultation and comments received, a suite of modifications to the DPD have been identified through the schedule of Regulation 19 representations and Council response document which is to be submitted to the Planning Inspectorate to help assist the Inspector in understanding the Councils position based on the representations received to the Regulation 19 consultation. The Councils Cabinet agreed on the 14 March 2023 that the HMO DPD and accompanying documents should be submitted to the Planning Inspectorate at the earliest opportunity following the conclusion of the publication period.

| Table 3: Regulation | 19 Key Issues |
|---------------------|---------------|
|---------------------|---------------|

| | espondent comments – summary of key | Officer response summary | |
|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| | sues | | |
| - - - | The DPD will only be effective if it is linked with the Article 4 Direction covering eleven wards. Concern there may be a surge of planning applications by landlords prior to the date when the DPD becomes effective. The continued increase of HMO properties has led to the collapse of community cohesion. Para 5.4 last sentence is factually incorrect in that the number should refer to 7 rather than 6. | It is the intention to bring forward the DPD and A4D together as far as reasonably possible. The Council will determine planning applications in accordance with its statutory legal duties and responsibilities. Agreed – proposal to correct the factual inaccuracy in para 5.4. | |
| HN | IO1: Homes in Multiple Occupation | | |
| - | Policies HMO1 and HMO4 to make clear that proposals for the provision of HMOs should avoid harming the significance of heritage assets (both designated and non-designated), including effects on their setting. In addition, we suggest that amending the phrasing of the policies from 'historic assets' to 'heritage assets' would better reflect the wording of the NPPF. Concerns regarding duplication between Policies HM01 and HM04 and these concerns do not appear to have been addressed and there is a resultant lack of clarity. It remains important that duplication/ cross-over risks are avoided. In order to reduce the likelihood of this happening, it is suggested that Policy HMO1 could be amended. | Agreed – suggested proposal to amend policy to include clarification of the phrasing as recommended in both cases. | |
| HN | IO2: Concentrations and Thresholds | | |
| | Disappointed that the threshold is set at 10% or more within 100m of an application. This is extremely generous – for example 10% of large HMOs would equate as a bare minimum to seventy people which would have major impacts on local amenities and community sustainability. We suggest that the threshold should be reduced to 5%. There are many neighborhoods where the 10% (or 5%) threshold is already exceeded within 100m. A 10% top limit is too high. Need to strengthen the policy by deleting the word 'supported' and replace with 'permitted'. | A single threshold has been set at 10% which is considered a modest level based on the size and scale of the challenge this DPD is aiming to address. Moreover, research based on similar size cities across the country which have already implemented a policy intervention to address HMO challenges, also suggests that the threshold would be appropriate and reasonable. Agreed - minor wording changes to strengthen the policy approach. | |
| HN | IO3: Sandwiching | - N/A | |
| | No issues received. | | |

| HMO4: Amonity and Design | | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| HMO4: Amenity and Design Need to include a reference to flood risk. HMOs often have ground-floor sleeping accommodation. This puts those on the ground floor at the highest risk of flooding. Policies HMO1 and HMO4 to make clear that proposals for the provision of HMOs should avoid harming the significance of heritage assets (both designated and non-designated), including effects on their setting. In addition, we suggest that amending the phrasing of the policies from 'historic assets' to 'heritage assets' would better reflect the wording of the NPPF. Policy HM04 should include a reference to flood risk. Request that pre- application discussions and submission of an appropriate management plan should be made to strengthen the policy approach in respect of Designing out Crime. | Agreed in part – suggestion to amend policy to include reference to a water exclusion strategy. Agreed – suggestion to amend policy to include clarification of the phrasing as recommended. Agreed – suggestion to add additional criteria to reference requirements for flood risk. Agreed that secured by design principles referenced in the policy adds value but not the inclusion of the reference to the Design Out Crime Officers (DOCO) at the pre-application stage as this would potentially unnecessarily add to the length of time to an already constrained time period through the | | | | |
| Assessment Process | determination process. | | | | |
| Stages 2 & 3 note that accurate data on HMOs is lacking. The real number of HMOs is likely to be higher because of HMOs that, for instance, have not been licensed. This supports our suggestion for a lower threshold of 5%. Also we recommend that when an application is submitted, consultation should involve informing all residents within the 100m zone including a request for their views on whether the details of existing HMOs are correct. This would provide valuable information for the licensing team. | The DPD is based on sound and robust evidence and planning application consultations for all HMO proposals will be carried out in accordance with the Councils established practices. | | | | |

Appendix 1- Regulation 18 Press notice



Appendix 2 – Regulation 18 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.
- OHowever, 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 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

Handwritten forms can be scanned and emailed to us at planningpolicy@coventry.gov.uk, alternatively, they can be posted (addressed to the Planning Policy Team) to PO Box 15, Council House, Earl Street, Coventry, CV1 SRR. 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.

OCan 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.

OHow 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.

OWhat 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.

OWhat 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.

O Do these policies still affect areas outside the areas listed?

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

OWill 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.

OWhen 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 nonimmediate direction; it is expected to be in place by autumn 2023.



Appendix 3 – Regulation 18 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 <u>planningpolicy@coventry.gov.uk</u>, 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 15th 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): | |
| | |

| Would you like us to add your email to our consultation database, so you a | 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 | | | | |

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Appendix 4 – Regulation 18 Social media analytics report

CAMPAIGN REPORT

1 Jul 22 - 11 Jan 23 **HMO DPD/A4D**

| y | Twitter 1 Account | | |
|---|-----------------------|----------|-------|
| | | 0 | 5 |
| | | MESSAGES | POSTS |
| f | Facebook 1 Account | | |
| | | 0 | 5 |
| | | MESSAGES | POSTS |

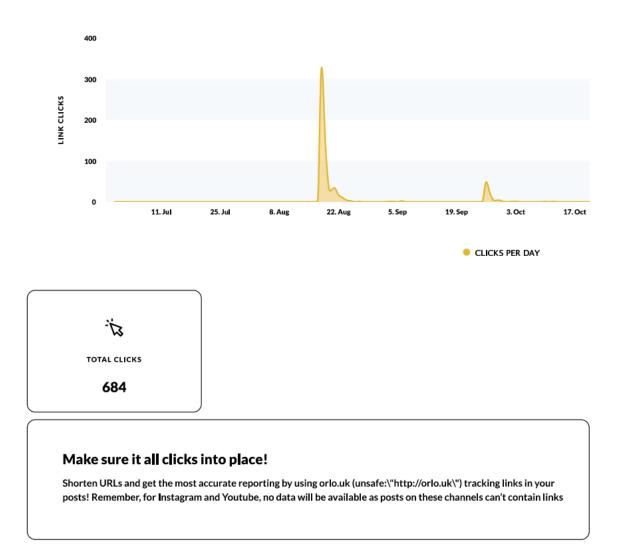
Overview

ALL NETWORKS TWITTER FACEBOOK



Link clicks

ALL NETWORKS TWITTER FACEBOOK INSTAGRAM LINKEDIN YOUTUBE



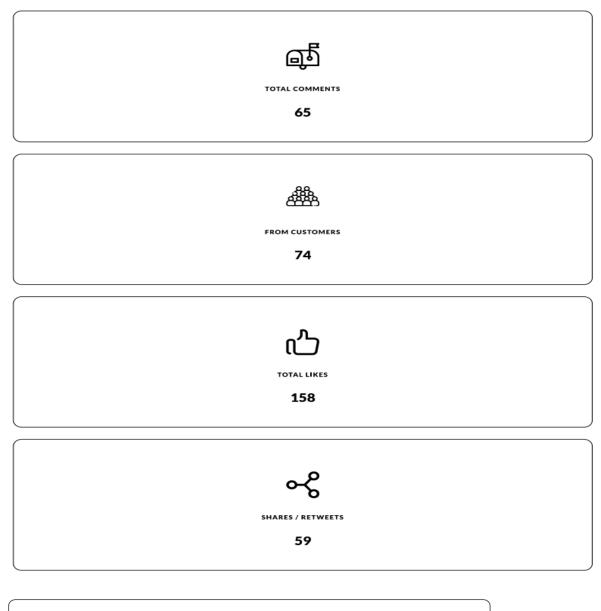


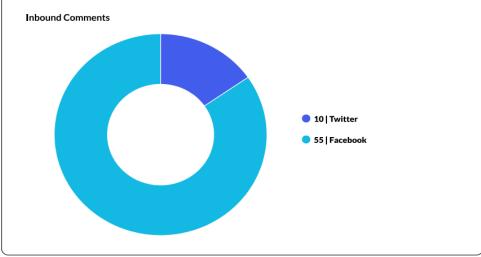
Global Link Clicks 🕐

| Locations | | |
|-------------------------|------|--|
| United Kingdom | 647 | |
| United States | 13 - | |
| Spain | 3 · | |
| Finland | 3 · | |
| Hong Kong | 3 · | |
| Ireland | 2 · | |
| Netherlands | 2 · | |
| Turkey | 2 · | |
| United Arab Emirates | 1 · | |
| Canada | 1 · | |
| Cyprus | 1 · | |
| Germany | 1 · | |
| Hungary | 1 · | |
| India | 1 · | |
| Italy | 1 · | |
| Romania | 1 · | |
| Sweden | 1 · | |

Posts breakdown

| Posts by Net | work | f | Facebook total reach |
|--------------|------|---|-------------------------|
| Twitter | 5 | | |
| Facebook | 5 | | |

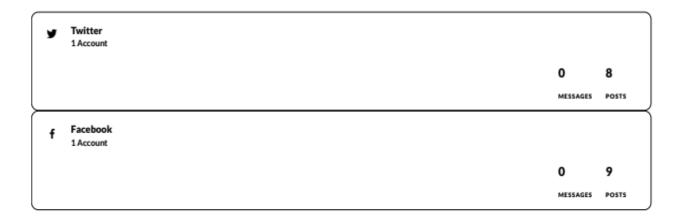




| Top Posts | | ALL NETWORKS | TWITTER | FACEBOOK | INSTAGRAM | LINKEDIN YOUTUB |
|-----------|--------------------------------------------------------------------------------------------|--------------|---------|---------------------------------------------------------------------|------------------------------|------------------|
| By Clicks | • | | | | | |
| View post | 18 Aug coventrycc f 2022 12:46 In early September, we'll be holding a public | | : | ♡ 91 ~ 32 ○ 40 * 512 | ে 27.7। ⊚ 28.6। ৵ 2.36 | 6 ⁻ 5 |
| View post | Coventrycc Public Consultation on our proposals for | | : | ♡ 2 ₽ 2 ⊙ 3 * 40 | i 1.7K ☞ 2.84 | 40 CLICKS |

| | rycc ♥ 2022 I 12:46 September, we'll ng a public | 魏 | : | © 4 ⊡ 1 ∵≿ 37 | © 1.9K ₽ 2.25 | 37 CLICKS |
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| Public Co | 26 Sep rycc f 2022 I 11:02 onsultation on osals for | | : | ♡5 ぷ3 ○2 ☆36 | ⊄* 2.1K © 2.2K ऌ 2.08 | |
| te We want | 11 Nov rycc f 2022 J 13:00 t to hear your s, ideas and | | : | ♡ 0 ぷ 0 ○ 0 ☆ 17 | ⊄* 1.3K @ 1.4K © 1.25 | |
| Your voie | 07 Nov rycc f 2022 11:00 ce matters. As ur public | | : | ♡2 ぷ3 ⊙0 *☆15 | ₩ 1.5K 1.6K ഈ 1.28 | |
| | 11 Nov 2022 I 13:00 t to hear your s, ideas and | | : | ♡ 0 | @ 919 ₽ 1.85 | |
| View post coventr | 07 Nov 2022 I 11:00 | | : | ♡ 1 0 0 0 | 617 ☞ 2.11 | |

Appendix 5 – Regulation 19 Social media analytics report



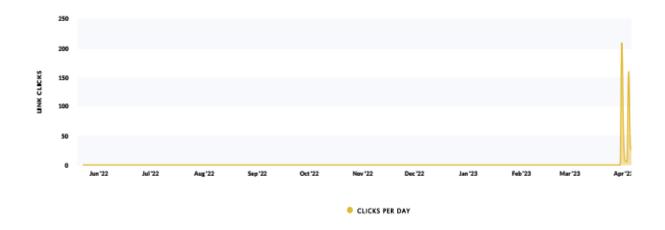
Overview

ALL NETWORKS TWITTER FACEBOOK





ALL NETWORKS TWITTER FACEBOOK INSTAGRAM LINKEDIN YOUTUBE





Make sure it all clicks into place!

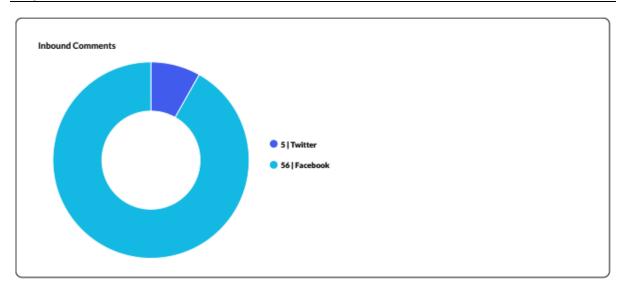
Shorten URLs and get the most accurate reporting by using orlo.uk (unsafe:\"http://orlo.uk\") tracking links in your posts! Remember, for Instagram and Youtube, no data will be available as posts on these channels can't contain links

Global Link Clicks 🕖



| Locations | |
|-------------------------|------------|
| United Kingdom | 570 |
| United States | 41 |
| Netherlands | 5 - |
| Germany | 2 • |
| Spain | 2 • |
| Hong Kong | 2 • |
| United Arab Emirates | i · |
| Australia | 1 · |
| Brazil | 1 · |
| France | 1 · |
| Hungary | 1 · |
| Italy | 1 · |
| Maldives | 1 · |
| Poland | 1 · |
| Saudi Arabia | 1 · |
| Singapore | i · |
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Top Posts

ALL NETWORKS TWITTER FACEBOOK INSTAGRAM LINKEDIN YOUTUBE

By Clicks 👻

View post

| | tar 2023 54:02 new document explaining how we intend homes in multiple occupation (HMOs) in | : | ♡ 41 ~° 14 ⊙ 31 *⊵ 433 | ጭ 15.6K 竣 15.8K ເ 3.29 | 433 CLICKS |
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| • | er 2023 12:01 homes in multiple occupation (HMOs) are o find out more about our revised HMO | : | ♡ 15 ∝ 1 ⊙ 7 × 150 | ¢ 11.5K ऴ 11.7K ৶ 1.48 | 150 CLICKS |
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| We've just published a new document explaining how we intend | | ତ 2 ୦୦୦ | I.52 |
| to limit the number of homes in multiple occupation (HMOs) in | | Q 3 | |
| | | °⊳ 41 | |
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| | | | |

Appendix 6 - Regulation 18 responses report

If you need this information in another format or language please contact us

Telephone: (024) 7683 1109

e-mail: planningpolicy@coventry.gov.uk