

Homes in Multiple Occupation (HMO)
Public Consultation September – December 2022
Summary of consultation responses

[Confirmation of Article 4 Direction in respect of Homes in Multiple Occupation \(HMO\)](#)

[CABINET & COUNCIL REPORT – APPENDIX 2](#)

[Article 4 Direction responses](#)

Respondent / agent	Consultation response (summary)	Officer response	Proposed change to A4D
Resident	<p>Although I see the importance of HMO's I strongly feel that it needs to be managed and monitored correctly to preserve local community services. Regarding changing numerous family homes into HMO's will of course reduce the number of families in the area and therefore will have a knock-on effect on families already living in the area. Schools (especially primary) will close as they will not have the children living in the area (already in Cheylesmore and Styvechale two primary schools have been reduced to half form and one form entry respectively). Therefore, the families that are still in that area will have to travel out of their local neighbourhood to take children to school. This will increase the need for car usage, instead of walking, and therefore have an impact on family health (reduction in exercise) and the environment and carbon emissions. Furthermore, this reduces the ability for these families to connect and network within their own community and could impact on mental health as they may feel isolated from their friends and support network (because they live in different areas of the city but attend the same school). New parents seek support from parent groups that are held in their local church or community centre and for some this is a lifeline in helping them cope with the changes in family life. Local community centres and</p>	<p>At the current time, any proposal for a small HMO is classed as permitted development. However, the draft DPD is being developed in parallel with a proposed Article 4 Direction which will seek to withdraw permitted development rights for small HMOs. There are significant existing concentrations of HMOs in certain wards across the city, where an Article 4 Direction will be developed (expected to be in place by 2023) removing permitted development rights for small HMO proposals (less than 6 unrelated occupants in a single dwelling). The introduction of an Article 4 Direction will not stop HMOs it will mean anyone who wishes to create a new HMO will need to apply for planning permission. All such applications will then be assessed against the policies within the HMO DPD.</p>	No change.

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	<p>schools offer a space for families to come together and connect to improve the area (in Cheylesmore there are numerous events held by volunteers who live in and surrounding areas). Neighbourhood services such as community centres, libraries and healthcare settings will become affected as the demographics change and services will change accordingly. In a society where children and families (especially those with lower incomes) are being stretched, and therefore their well-being and mental health being strained, communities need to be able to come together and support one another and this usually starts with local schools and community services that are within walking distance of their home. My children are at university and use HMO's for their living arrangements so I fully support HMO's but they need to be managed correctly – including ensuring the landlords are following guidelines correctly and providing decent homes for the occupants. Neighbourhoods, and communities, need to remain demographically diverse and can only be achieved by careful management of the housing within the area to avoid areas being dominated by HMO's.</p>		
<p>Chapelfields Area Residents' and Traders' Association (CARTA)</p>	<p>Our area was designated a Conservation Area in 1976 to ensure that the area maintains its unique character and provides protection for the historical watchmakers' buildings. The majority of housing was built in the mid to late 1800s to support the watchmaking industry in the city. The properties are generally narrow terraced houses, built directly on to the street or with small front yards, i.e. there is very limited off road parking. A small number of more recent developments do have parking provided for residents (often 1 single space for a 2</p>	<p>Comment of support noted.</p>	<p>No change.</p>

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	<p>bedroom house). In addition to the residential properties we also continue to have a rich pub culture with 6 pubs in the area. Until recently the area was popular with families. The majority of properties are between 2-4 bedrooms, have good sized rear gardens and the area is conveniently located for local primary schools and within walking distance of the city centre. Families would often stay in the area for many years, however, in the last 5-10 years estate agents have been marketing the area to investors. This has meant that a number of family homes have been converted into HMOs. The impact on the area has been huge. Where previously residents would stay in the area for years now we have tenants of HMOs who stay for a matter of months. The parking situation has become unbearable, with some houses now having 4-5 cars where before they would have had 1-2. Long term residents are considering leaving the area because of the number of HMOs. We believe Article 4 is essential to stopping the further decline of our community. This will ensure that any change of use from a single dwelling to an HMO requires planning permission.</p>		
Resident	<p>I write in support of introducing Article 4 Direction in Coventry, and Cannon Park estate in particular. The estate is now almost unrecognisable in some areas. The density of licenced HMOs and smaller student rentals has completely changed the demographic of the estate. Generally (not always) the student homes are in disrepair, front gardens are not managed, litter is a problem as is the proliferation of shopping trollies all over the estate. I urge you to take the above into account and look at the statistics for saturation of student lettings versus family homes on Cannon Park estate and</p>	<p>Comments of support noted. The Cannon Park area falls within the Wainbody electoral ward and is proposed to be included in the Article 4 Direction area. This will ensure that once the Article 4 Direction comes into effect, the permitted development right will not apply and any proposal to convert residential property to a HMO will require planning permission. Licensing is dealt with under a separate regime to planning and so all licensing matters will remain the responsibility of the Councils licensing team.</p>	No change.

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	implement Article 4 as a matter of urgency. I would also ask that any retrospective applications for HMO licences are denied.		
Coventry Action for Neighbourhoods	The Coventry Action for Neighbourhoods was set up eight years ago to try and get the city council to take on board Article 4 Direction like many other University cities around the country, to stop areas of the city being taken over with HMO's and changing the make up of the local neighbourhood. Over the many years we have produced a newsletter, all can be seen on the Coventry Action for Neighbourhoods facebook site. Every week the newsletter is sent to all standing Coventry City Councillors so by now they should know our thoughts.	Comments of observation and support noted.	No change.
Resident	In response to Article 4 proposal, I consider setting a maximum number of HMO's in a residential area is appropriate. I would support a 5% level for local areas, to maintain a balance in the community.	The setting of a 10% threshold was given to represent a fair and modest level based on the size and scale of the challenge of the intervention the Council 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 of 10% would be appropriate and reasonable.	No change.
Resident	I do not believe that the houses in the Moreall meadows estate are suitable or should be used as HMOs as they are family homes designed for the use of families. I therefore do not want HMOs on the estate.	The properties to which you refer fall within the Wainbody electoral ward and are proposed to be included in the Article 4 Direction area. This will ensure that once the Article 4 Direction comes into effect, the permitted development right will not apply and any proposal to convert residential property to a HMO will require planning permission.	No change.
Resident	I support the proposed changes to planning regulations to control the future number of HMOs. These powers need to be linked to the licensing controls on existing	The 11 selected wards that have been selected as part of the proposed Article 4 Direction area is based on a review of the available evidence on HMO	No change.

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	<p>HMOs, because there are already many issues in some neighbourhoods. Also, I am concerned that the proposals do not cover all wards. In some other English cities, there are examples where because of planning and licensing changes in some wards, landlords have chosen to set up HMOs in wards that are not covered by these control schemes.</p>	<p>density, an analysis of Lower Super Output Area (LSOA) data and local community feedback that links issues such as anti-social behaviour back to the intensity of HMO concentrations. This approach also considers the issue of displacement, ensuring that developers cannot simply move a few yards down the road from an existing hot spot and renew the HMO development process. A ward based approach also offers easily understood boundaries in that existing ward boundaries are well established and generally well understood.</p>	
<p>West Midlands Police</p>	<p>The CCWMP supports the purpose of the Article 4 Direction and DPDs, and the 4 proposed policies therein, to enable the Council to manage the distribution and concentrations of HMOs within the City, in line with national planning policy and specifically the adopted policies of the Coventry City Local Plan. The CCWMP formally requests that the Article 4 Direction be amended to include all wards within the City (as opposed to the 11 wards presently identified) to ensure that the proposed policy controls within the DPD apply to all areas of the City and to avoid the displacement of the over-concentration of HMOs to the presently omitted areas.</p>	<p>Comments of support noted. The 11 selected wards that have been selected as part of the proposed Article 4 Direction area is based on a review of the available evidence on HMO density, an analysis of Lower Super Output Area (LSOA) data and local community feedback that links issues such as anti-social behaviour back to the intensity of HMO concentrations. This approach also considers the issue of displacement, ensuring that developers cannot simply move a few yards down the road from an existing hot spot and renew the HMO development process. A ward based approach also offers easily understood boundaries in that existing ward boundaries are well established and generally well understood. It is respectfully stated that the full rationale and explanation of this approach is set out in the evidence based documents that support the Article 4 Direction which clearly articulates the reasons why a city wide approach is not appropriate based on the available evidence. In drawing the boundaries of the Article 4 Direction area officers</p>	<p>No change.</p>

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		have been cognisant of the requirements of the National Planning Policy Framework (NPPF) paragraph 53 for making sure the area is as based on robust evidence and applies to the smallest geographical area possible, whilst also considering the likely impacts on similar dwelling typologies.	
Safe HMO	Article 4 will effectively halt local private accommodation being limited or not available to these potential students, and therefore restrict the number of good quality accommodation being built in Coventry. In addition, with Article 4 directive and its ability to restrict HMO development, & therefore with less accommodation available for students it will also drive up the un-affordability within the existing housing stock that's available, for students. An Article 4 directive will not therefore resolve this problem and by further restricting more quality private HMO accommodation being built, (which in essence is what Coventry needs, both for the local businesses and student demand to strive going forward), will in fact have a negative effect on the local economy & inward investment coming into the City on a yearly basis, both from students and businesses alike.	The purpose of the Article 4 Direction is to remove permitted development rights for the change of use of dwelling houses (C3 use) to small houses in multiple occupation (C4 use) so that any proposal of this type will require planning permission. It is not the intention of the Article 4 Direction to halt local private accommodation being used to accommodate students in any way whatsoever. As the report put before the Councils Cabinet on 30 August 2022 outlined, the Council's intentions with the Article 4 Direction are to change the rules which would prevent landlords and property developers from turning some residential homes into HMOs without full planning permission. In doing so, the move would prevent any unnecessary and avoidable displacement of families searching for properties and provides opportunities for those looking to get onto the property ladder by limiting the number of HMOs in certain wards, and ensuring that they are not located so closely together.	No change.
Cannon Park Community Association	Whilst CPCA generally welcomes the introduction of Article 4 Direction, the consultation documentation would benefit from a very clear position being made about its application in areas such as Cannon Park Estate where the stated threshold of 10% HMOs is already significantly exceeded. Whilst appreciating this is not just	The purpose of the Article 4 Direction is to remove permitted development rights for the change of use of dwelling houses (C3 use) to small houses in multiple occupation (C4 use) so that any proposal of this type will require planning permission. It is not the intention of the Article 4 Direction to halt local	No change.

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	<p>a Cannon Park issue when taken in the context of the whole city, this is a very important concern to those who continue to own and occupy homes in the area.</p>	<p>private accommodation being used to accommodate students in any way whatsoever. As the report put before the Council's Cabinet on 30 August 2022 outlined, the Council's intentions with the Article 4 Direction are to change the rules which would prevent landlords and property developers from turning some residential homes into HMOs without full planning permission. In doing so, the move would prevent any unnecessary and avoidable displacement of families searching for properties and provides opportunities for those looking to get onto the property ladder by limiting the number of HMOs in certain wards, and ensuring that they are not located so closely together.</p>	
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