

Homes in Multiple Occupation (HMO) Development Plan Document (DPD) Schedule of Final Additional Modifications (February 2024) to the Published Submission Version (August 2023)

The following format has been used to denote the modifications:

Underlined bold text = new text proposed for policy compared to the submission version.

~~Strikethrough text~~ = text proposed for removal compared to the submission version.

Underlined text = new text proposed for justification text compared to the submission version.

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Additional Modification Number	Plan Reference	Proposed Main Modification	Reason for Modification
ADM 01	Page 4 Final paragraph	The submission version DPD is the document that will be submitted to the Planning Inspectorate for examination. It is the version the Council will seek to adopt, subject to that examination, as the future framework for decision making.	The inclusion of this paragraph is superfluous.
ADM 02	Page 9 Para 3.9	From a planning perspective, the Use Classes Order ¹ distinguishes between ‘small’ HMOs of up to six people (C4 use class), and ‘large’ HMOs of seven or more occupants (Sui Generis). Currently, planning permission is not needed to change the use of a house to a HMO with 3-6 residents, which is known as Permitted Development (PD). The effect of any prospective Article 4 Direction covering HMOs in Coventry will be means that, within any the designated area, planning permission would be is required for all HMO proposals (small or large).	Minor textual change to reflect the current position.
ADM 03	Page 15 Para 5.4	At the current time, any proposal for a small HMO is classed as permitted development. However, this DPD has been developed in parallel with a proposed an Article 4 Direction which will seek to has withdrawn those permitted development rights for small HMOs. There are significant existing concentrations of HMOs in certain wards across the city, <u>which are covered by where an the Article 4 Direction meaning that like large HMO proposals, will be developed (expected to be in place by 2023) removing permitted development rights for small HMO proposals (less than 6 7 unrelated occupants in a single dwelling) in those areas now require planning permission.</u>	To correct a factual inaccuracy and provide a necessary update.
ADM 04	Page 16 Para 5.6	Whilst there is an existing and corporately agreed approach to managing HMOs through the licencing regime, there is a need to strengthen existing planning policy to address HMO concentration coupled with a proposed non immediate <u>the introduction of the Article 4 Direction to withdraw permitted development rights within specific wards of the city (expected to be in place in 2023).</u> The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (three	Minor textual change to reflect the current position.

¹ www.planninggeek.co.uk/use-class/use-class-c/

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		<p>bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people. The cumulative effect of incremental intensification in an area caused by numerous changes of use from small HMO to large HMOs or the extension of existing HMOs can be also significant. For these reasons, applications for such changes will be assessed using the criteria in policies HMO1 and HMO4.</p>	
ADM 05	Page 17 Para 5.9	<p>It is not the aim of the policy to reduce overall HMO numbers or to stop further HMO proposals coming forward, but to ensure that potentially harmful concentrations do not arise and that a high standard of accommodation and amenity is created, given the important role HMOs play as part of the city’s housing offer. Clearly, patterns of supply and demand will change over time but there is a link between student shared-houses and the increasing provision of purpose-built student accommodation located in the city centre. Restricting HMO supply in one neighbourhood, may prompt landlords to examine adjoining areas, displacing the concentration. Consequently, boundaries may change, and new areas may be identified. Such areas would be subject to <u>this</u> the preferred option policy.</p>	<p>Minor textual change to reflect the current position.</p>
ADM 06	Page 18 Para 5.10	<p>The proposed eleven wards to be included within the Article 4 Direction area have varying levels of existing HMO dwelling concentrations. However, the preferred option would <u>policy applies</u> to the city as a whole rather than at individual street level. A single threshold has been set at 10% which is considered to be 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. For 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.</p>	<p>Minor textual change to reflect the current position.</p>

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ADM 07	Page 22 Section 6, stage 2	Delete the words 'expected to be' and 'proposed' from the third bullet point.	To reflect the most up-to-date position.