Proposed Regulation 7 Direction under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007

Draft Consultation Statement

September 2020

Contents

1. Introduction

1.1 The Statement sets out how the Council considers it has consulted and engaged with the public on the preparation of the Proposed Regulation 7 Direction under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

1.2 The Council proposes a Direction under Regulation 7 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 to control the display of To Let Boards by removing deemed consent under Schedule 3, Part 1, Class 3A (hereafter referred to as the 'Direction' in this document).

2. Purpose of this document

2.1 This Consultation Statement provides a summary of the engagement and consultation which the Council has undertaken to inform the preparation and submission of the Direction.

2.2 The Consultation Statement outlines:

- Section 3: Who we consulted
- Section 4: What we consulted on
- Section 5: How we have engaged
- Section 6: What issues were raised and
- Section 7: How the issues were addressed

3. Who we consulted

3.1 Through the process, the Council have sought to engage with the widest range of individuals, communities, organisations and stakeholders who may hold an interest in, or may be affected by, the Direction:

- The purpose of the Direction, the process of preparing it and how and when they may be affected;
- How and when they can comment on and get involved and what they can and can't influence; and
- How and when their comments will be taken into account by the Council.

3.2 The Statement of Community Involvement (SCI) was reviewed and adopted in January 2019 and reflects the 2012 Regulations. Temporary COVID-19 and social distancing related updates were made in June 2020. The SCI sets out the Council's approach to engaging with stakeholders It identifies who we engage with. The table below is not exhaustive and is amended or added to as required.

3.4 In addition to the organisations set out in the table below, the Council also consult with the general public, all Council Members, agents, developers, education establishments, 3rd sector and local businesses who sign up to the Council's Planning Consultation Database.

Who we consulted	
Specific Bodies	
The Coal Authority	
The Environment Agency	
Historic England (Historic Buildings and Monuments Commission for England)	
Marine Management Organisation	
Natural England	
Office of Rail and Road (now called Office of Rail Regulation)	
Highways England	
Homes England	
Adjoining Local Planning Authorities	Barrow Council Craven District Council Lake District National Park Authority Ribble Valley Borough Council South Lakeland District Council Wyre Borough Council Yorkshire Dales National Park Authority
Area of Outstanding Beauty	Arnside and Silverdale AONB Forest of Bowland AONB
County Council	Cumbria County Council (+ libraries in the Lancaster District) Lancashire County Council
Parish Councils	
Lancaster City Councillors	
Local policing body	Lancashire Police and Crime Commissioner Lancashire Constabulary
Relevant telecommunications companies	PO Broadband, BT Openreach, Vodafone, O2, EE
Primary Care Trust or successor body	Clinical Commissioning Group
Relevant electricity and gas companies	National Grid (Electricity) National Grid (Gas) Electricity North West E.on British Gas
Relevant water and sewerage companies	United Utilities
Others	Members of public Developer / Agents Landowners Businesses 3rd Sector Advocate groups Educational establishments Government organisations (NHS) Lancaster University Homes

4. What we consulted on

4.1 For a six-week period between 21st February and 3rd April 2020 the Council carried out public consultation on:

- The introduction of a Direction to control the display of To Let Boards.
- The introduction of an Article 4 to manage the concentration of Houses in Multiple Occupation (HMO) in the wards within the city of Lancaster and the village of Galgate; and
- A Draft Residential Conversions and Houses in Multiple Occupation SPD;

4.2 The aim of the consultation was to carry out early consultation with stakeholders and provide an additional informal opportunity for comments on the proposed Direction and the extent of the area this will cover.

5. How we have engaged

5.1 Table 5.1 below outlines the consultation methods adopted to satisfy the requirements of regulation consultation and to ensure that the requirements of the Council's Statement of Community Involvement have been met.

Requirements of Regulation	How the Council satisfied the requirement
Which bodies and persons the local planning authority invited to make representations	Consultation Database www.lancaster.gov.uk/ppcl) consultees were notified on the opportunities to participate in preparation of the draft SPD. The database consisted of residents and organisations who had been consulted on previous policy matters, those that had requested for inclusion and statutory bodies for which the Council must satisfy commitments to engage in ongoing duty to co-operate obligations. Presentation and Q&A via the Lancaster University Homes Webinar for landlords of student accommodation 12 August 2020
How those bodies and persons were invited to make representations.	Consultation ran for 6 weeks, 21 February 2020 – 3 April 2020 This included a period of publicity across the Lancaster District, with a Consultation Flyer and a public notice placed in Lancaster Guardian (a local newspaper) following the start of the consultation. Emails sent to over 2,200 consultees on the planning policy consultation database Posters were placed in 20 locations around Lancaster City and in Galgate, and over 80 posters where sent to venues in the area to ask them to display on notice boards

Requirements of Regulation	How the Council satisfied the requirement
	Another email (bcc) was sent to known letting agents advising of the consultation on 2 March. It is acknowledged that not all agents may have been captured and this was sent part way into the consultation. The notification was however, in additional to the Councils agreed publicity procedure. Information on the consultation was published on the Council webpages and copies of the consultation documents were made available at the 'Principal Offices'. Further details on the publicity methods are set out in more detail within Appendix A
A summary of the main issues raised by the representations made	The main issues raised in the representations are summarised in Section 6 of this document. Full details on the main issues raised are set out in Section 6 and in **Appendix A: Summary of Consultation Responses** and the Officer response is set out in the Section 7 of this document
How any representations made pursuant to regulation 18 have been taken into account.	The Council has responded to each comment submitted to the Council following the period of consultation. Replies also outlined how the comments have informed the final draft SPD. Section 5 of this statement outlines how the Council engaged in this round of consultation Section 6 outlines what issues were raised and Section 7 outlines how these issues have been addressed.

6. What issues were raised during the informal consultation?

6.1 The consultation provided the first opportunity for members of the public and interested parties to comment on the proposed Direction and the area it was proposed to cover. As the consultation related to the proposed Direction, Article 4 and SPD the range of responses received were varied and the level of detail provided extensive. There were 97 separate consultee responses in respect of the 3 proposals. 49 responses relate to the proposals to restrict To Let Boards. All 49 support the proposals to restrict To Let boards and no objections in respect of this matter were received. One of the responses has been qualified with the comment that restrictions should relate to 'To Let' boards only and they should be permitted inside windows.

6.2 The responses specifically in respect of the proposed Direction:

Support

- Significant support for controlling To Let Boards

- An interim measure should be taken to engage with agents to voluntarily minimise signs
- Uncontrolled sign boards adversely affect the appearance and reputation of many streets
- Signs are visually detrimental
- The Direction should include all areas in the city including Marsh, Scotforth East, Skerton East and Skerton West
- The Direction may be beneficial across the whole district
- The display of 'To Let' signs all year round enforce harmful and negative perceptions of students
- The necessity of signs was questioned given the digital marketing available
- Student accommodation is found overwhelmingly on-line, only 3% of student respondents to Lancaster University Students Union survey advised that they were influenced by 'To Let' boards

Comments

- Signs are not a problem apart from when they state, 'now let'
- The preference would be for the controls to be in place for 'To Let' boards but not 'For Sale' signs
- Signs should be permitted in windows

6.3 The responses in respect of the proposed Article 4 Direction and the Supplementary Planning Document will be addressed separately when those proposals are progressed.

7. How these issues were addressed in the Proposed Direction

7.1 As highlighted in Section 6 of this statement, the Council received a range of responses to the consultation. An explanation is provided below to show how these issues have been dealt with in the preparation of the proposed Direction.

1. Interim measure to engage with agents
   An email was sent to agent in March reminding them of the Advertisement Regulation controls and encouraging a reduction in the number of signs displayed and the length of time they were displayed.
   A webinar has taken place on the 12 August 2020, hosted by Lancaster University Homes. The proposals were explained, and agents were encouraged to minimise To Let boards.

2. Increasing the area of the Direction
   The area proposed for the Direction has been increased to incorporate the additional wards of Marsh and Scotforth East. It is now proposed that the Direction will include the wards of Bulk, Castle, John O'Gaunt, Marsh, Scotforth East and Scotforth West. This will ensure that wards south of the river will be covered and provide a simpler area to enforce. It is not considered appropriate to include University ward as most of the Letting/HMO properties are on the University campus. The numbers of HMOs in the Skerton wards are low and they tend to be dispersed. It is also not considered appropriate to restrict signs throughout the whole of the district.

3. Controlling 'To Let' boards but not 'For Sale' signs

The proposals will be amended to request the removal of deemed consent for the display of advertisements relating to the letting of residential properties only. This will allow the display of For Sale signs for residential properties and for the display of for sale and letting signs in connection with commercial properties.

4. Signs should be permitted in windows
   Class 12 of the of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 grants deemed consent for the display of signs in buildings. The proposals will not affect such signs.

Appendix A: Summary of Consultation Responses

The summary includes all response in received in respect of the proposed Regulation 7 Direction, the proposed Article 4 and the draft SPD. Where responses do not relate to 'To Let' signs, the support/object/comment column states 'comment'.

Resident/Agent/Landlord	Support/Object/Comment	Summary of Comment
Resident	Comment	Houses should be subject to planning consent processes to maintain character. Ideally residents would be long term. House purchasers should have to inform the council if planning to convert to HMOs, residents could then help to inform the planning process. Restrictions should be put in place to cap the number of HMOs vs long term residents. There is plenty of student accommodation so there shouldn't be a need to use residential areas.
Resident	Comment	Support the proposals in document 1, which is a positive response to problems that have impacted on many residents. Particularly support the provisions of cycle storage for HMO residents.

Resident	Support	Huge increase in HMO's in the area, therefore there is no longer a balanced mix of households and as a result community spirit has suffered. Landlords are often not from the area and HMOs provide high rent, which can exclude those on low incomes. HMOs also reduce the number of first-time buyer homes on the market. Residential areas were not designed for HMOs and consequently this causes problems e.g. waste issues. The number of HMOs should be reduced and planning permission should be required for the conversion of properties to HMOs. There should be a requirement that a HMO can easily be reverted to its original state. Planning permission should also be required for letting boards. The conversion of properties also has an impact on the local environment e.g. materials being ripped out and replaced, gardens being paved over increasing the flood risk and impact on 'natural urban corridors'.
Resident	Support	HMOs should require planning permission as there should be adequate student accommodation. Housing should be affordable for families. Support limiting the number of 'to let' signs .
Resident	Comment	Appendix B: standards for HMOs - the proposals are more onerous than the current standards and may mean that many properties could not be converted. It is unlikely that existing HMOs would comply with the proposed standards. The proposed rules are harsh and the existing ones should remain.
Resident	Support	Has been suggesting regulation for a long time. There is a particularly high percentage of HMOs on Golgotha Road. It is not possible to limit numbers on a street by street basis. The proposed standards are not enough, and a policy of reversal should be put in place. Planning permission should be required. Original property features have been removed/destroyed. HMOs create pressure on local services i.e. waste. Support need for planning permission for 'to let' signs. St Oswald Street is particularly unattractive because of this. Restrictions should also be placed on putting similar information in property windows. Signage is unnecessary in this digital age. Parking restrictions could help improve the issues caused by cars from HMOs, other residents and the University.

Resident	Comment	Student accommodation provides vital support to the local housing market. Competition helps to maintain high standards. Much of the new student accommodation is very expensive, therefore does not replace the cheaper HMOs. Cable Street, North Road, Kingsway, North Street, St Leonards Gate and Brock Street are full of student housing. However, many of these were previously commercial buildings which families were unlikely to want to live in.
Resident	Support	John O'Gaunt ward includes a mix of permanent and long term residences and HMOs (primarily students). HMOs present many problems to the permanent and long term residents egg waste, noise, parking, anti-social behaviour. The number of HMOs do not seem to be reducing, even though purpose built student accommodation has been made available. 'To let' and 'now let' banners are an issue. Support proposals to limit the number of HMOs, require planning permission and regulate 'to let' signage.
	Comment	The proposals will greatly improve community cohesion.
Resident	Support	Support all three proposals. Areas with high concentrations of HMOs have service and amenity issues. Purpose built student accommodation reduces the need for traditional housing to be converted to HMOs. The proposal to require planning permission would help to reduce the number of bedrooms being crammed into HMOs. Restricting the number of HMOs would help to retain family housing and permission for 'to let' signs would improve the look of areas with HMOs. It is important to hold landlords to account and keep the right balance of housing provision.
City Councillor	Support	Support all three proposals including restriction on numbers of HMOs, requiring planning permission for HMOs and regulation of 'to let' boards.
	Support	Support all three proposals and they need to be introduced asap.

Resident	Comment	Proposals are well thought through and suggest considered responses to some increasing problems. Parking is an issue that is not only caused students but other residents too. Anti-social behaviour issues need to be looked at. Community cohesion is also a concern. Covid 19 has brought the community together and would like this to continue egg shared street cleaning responsibilities, community led public events, community allotments. Environmental impacts of cars and use of bollards needs to be reviewed. Fines need to be put in place to support non compliance. The proposals could contribute to positive social change.
Resident	Comment	High numbers of HMOs have caused waste, noise and parking issues. HMOs also have an impact on the value of and selling homes.
Resident	Support	Support all three proposals. The issues of most immediate impact are the proposals on noise and car parking. Suggest that insulation is included in the permissions and a maximum number of cars per household. Refuse storage and intensity impact on character. HMOs often remove the gardens which help to provide character. Support the application of Article 4 in the areas designated in Appendix 2. The council could look at ways to attract the current HMO owners to invest in the student apartment blocks. Support proposal to require planning permission for HMO conversions, although would suggest a date to review this policy.
Resident	Comment	Castle ward has a high number of HMOs which have increased over several years. HMOs do not meet student needs and change the character of an area, they also cause many issues egg waste, noise, no maintenance. The requirement of planning permission will help to provide an appropriate housing mix and protect the character of areas. Controlling the concentration of HMOs is vital and the proposed changes will support a more robust and sustainable approach locally.
Resident	Support	Support proposals to limit the proportion of HMOs and restrictions on 'to let' boards'. Regent Street is made up of 30% of HMOs. Have had no problems with students in the street but would like to ensure a mix of housing.

Resident	Comment	Support Article 4 directive. Increase in HMOs has negatively impacted local area. Appreciate the value of students in Lancaster but it is unfair to take up streets. Create various issues egg waste, noise. Original features have often been replaced, sometimes in conservation areas which needs to be addressed. Majority of students are polite and friendly, but landlords do not maintain their properties.
City Councillor	Support	Support all three proposals. Scotforth west ward councillor so listened to lots of residents views on the high density of HMOs and issues caused by these egg noise, waste and parking. Restricting the use of 'to let' boards will also help to improve the character of areas.
Resident	Support	High density of HMOs without planning permission, stopping families buying properties and causing issues egg waste and parking. Letting boards devalue houses and discourage other families living in the areas.
Resident	Comment	Support proposal to restrict density of HMOs.
Resident	Support	Support Regulation 7 Direction proposal, particularly the removal of 'to let' boards which are unnecessary as most students will look online. Also support the proposal to request planning permission, although this should be district wide and disagree with the 10% in 100m limit. Student accommodation blocks are not the best solution.
Resident	Comment	Support the proposal to require planning permission. Live in John O'Gaunt ward and there seems to be an increasing high density of HMOs in Perth Street. Would want to move if there were more HMOs on street. Waste issues have increased. Support control of the character of the ward.
	Comment	Page 4 Policy D13 - No exceptions should be made to the 10% or more HMOs within a 100m radius.
Resident	Support	SPD 8.2 - Support the proposal to restrict 'to let' boards, in fact they should be banned for student housing.

Resident	Support	There is no need for 'to let' boards in the age of the internet. Support proposal to require planning permission, including 4 bed HMOs which has not been included in the proposed policy. Student renting is profitable and reduces the availability on non-student renting. Support the proposal to strengthen regulations on the conversion of houses to some sizes of HMOs, reduce 'to let' boards and would urge the council to go further in future.
Resident	Support	Support all three proposals. Section 8 - visual impact of 'to let' signs and refuse bins in Primrose area and along South Road is poor. The need to provide a license would help to control properties.
Resident	Support	Concerned about impact of HMOs in Allandale Gardens. Landlord for long term let in this area. Support the proposals but they don't go far enough. Suggest below is also required: DM13 should also apply to small HMOs and require a license, Article 4 should not be delayed to avoid a rush of conversions and this consultation provides notice of this, support Regulation 7 areas but should also include the Article 4 areas i.e. Marsh Ward, Scotforth East Ward, Skerton West Ward and Skerton East Ward.
Resident	Support	Support proposal to limit the density of HMOs and restriction of 'to let' signs. Live in Scotforth West which has a high number of HMOs. Support landlords having more responsibility for the external maintenance and cleanliness of their properties. Students do not pay tax for local services so landlords should be charged. Students do not get involved in local issues or the look of a street. Danger of creating 'student ghettos'.
Resident	Support	Support all three proposals. County Councillor for Lancaster East which includes most of the areas affected by the changes. Resident feedback suggests that the high density of HMOs changes the character of an area and impacts on community cohesion. HMOs also cause issues egg waste, noise and lack of maintenance. Supported purpose built accommodation to help with these issues. HMOs also impact on residents ability to rent and sell their properties. Hope proposals will help to meet the needs of families and young workers. 'To let' boards are a common complaint from residents. Pleased that the council is taking action in response to resident concerns.

Resident	Support	Support all three proposals. Hope that this will release affordable family homes and help with the sale of properties.
Resident	Support	Support all three proposals. Student accommodation in residential areas has reached a situation point and is negatively impacting local areas.
Resident	Support	Support all three proposals but would like to see retrospective enforcement against existing HMOs who do not meet the standards.
Resident	Comment	Live in freehold district of Lancaster. Students have never caused any problems but the lack of maintenance and emptiness for part of the year is an issue.
Resident	Support	Welcome the proposal. Have no problem with students but the 'to let' signs, lack of maintenance, loss of original features and waste are an issue.
Resident	Support	Support proposals.
Resident	Support	Support proposals. Enjoy having student neighbours but HMOs cause various issues e.g. waste and parking. Also support restrictions on 'to let' boards, ideally use of them should be banned.
Resident	Support	Strongly disagree with proposals. This would mean that if someone is finding it hard to live in a student area and were struggling to sell, they would no longer have the option to convert their house into a HMO. It would be fairer if 'new owners' could not convert houses into HMOs, but owners for at least 5 years could have the option to do so if they chose or current owners should be given 2 years notice. Support restriction of 'to let' boards, in fact they should be banned.
Resident	Support	John O'Gaunt Councillor - These issues are regularly raised by residents. The high density and the use of 'to let' boards are an issue. Need to work towards a mix of housing within our communities.
Resident	Comment	The proposals are well thought through to protect and enhance the range and level of accommodation for all those who live, work and study in Lancaster.

Member of Parliament, Lancaster and Fleetwood	Comment	Support the proposals which positively respond to the issues being raised by residents.
Resident	Comment	Support proposal on HMO restrictions. Purpose built student accommodation not resulting in HMOs returning to original state.
Resident	Support	The number of HMOs has increased in South Road. Noise issues tend to be at the start of the academic year and after exams finish. Support the proposed restrictions on 'to let' signs.
Resident	Comment	Students help to support local businesses and the general economy, however, HMOs have led to artificially high house prices. Purpose built student accommodation should mean that houses can be made available for other residents to choose to live in the city.
Resident	Comment	High density of HMOs has led to low availability of affordable homes for people on low incomes.
Resident	Comment	Mixing students and residents has led to anti-social behaviour and parking issues.
Resident	Comment	HMOs can cause waste, noise, parking and no maintenance issues.
Resident	Support	Support all three proposals. More control and scrutiny will deter sub-standard landlords.
Resident	Comment	No comment.
Resident	Support	HMOs can cause waste, noise and parking issues. 'To let' boards can impact the character of roads. The purpose built student accommodation should mean that affordable houses become more available for families.
Resident	Support	The purpose built student accommodation should mean that affordable houses become more available for families. Support proposed restrictions on 'to let' signs.
Resident	Support	Support all three proposals. A reduction in HMOs would make more houses available for other residents.
Resident	Support	Support all three proposals. HMOs should require planning permission and 'to let' boards should be restricted. Boards should be located on actual properties of in the windows only.

Resident	Support	Support Regulation 7 proposal, as prospective tenants will most likely be looking for accommodation online. Regulations should be put in place on the external appearance of all properties egg Bath bylaw fines building owners who do not maintain their properties. Article 4 should be carefully considered. Fines should be put in place for maintaining properties and anti-social behaviour issues. From experience, students are not a problem but sometimes other tenants can be.
Resident	Comment	The integration of students with local residential community is important, however, it should be managed by Universities not private landlords. Universities should encourage students not to use cars. Planning permission should only be given if there is co-operation between the University and Local Authority. Anti-social behaviour from students should be reported to the Universities, this should not be a problem for the Local Authorities to deal with alone. Other city universities seem to be more involved in supporting students to find suitable accommodation.
Resident	Support	Support all three proposals. Well done Lancaster City Council for finally addressing this problem. HMOs can impact on community cohesion and the high numbers of 'to let' boards look terrible. The council should make the universities know that they must take joint responsibility for the situation and be expected to help to fund the initiative.
Resident	Comment	Object to the proposed restrictions on HMOs. Purpose built student accommodation is the problem, social housing should be being built instead.
Resident	Comment	Concerned about HMOs, particularly when there is a shortage of housing for families. It is a good time to place restrictions on HMOs now purpose built student accommodation is in place. Regulations would discourage HMO conversions which take up family homes.
Resident	Support	Support the requirement of planning permission but think this should apply to all house sizes. HMOs can cause waste and parking issues. Support the proposal to restrict the use if 'to let' boards but feel that it should go further egg each agent should have one board on a street which lists all the houses they have to let on that particular street.

Resident	Comment	Long overdue.
Resident	Comment	Long overdue. HMOs can cause waste, parking, noise and no maintenance issues.
Resident	Comment	HMOs impact on community cohesion and can cause parking issues. The purpose built student accommodation should mean that houses are freed up for families but allowing them to be turned into HMOs means that this is not happening. HMOs do not provide the level of community charge to provide services.
Freelance Planner	Support	Help to address socio-economic concerns and environment/amenity issues via more effective regulation and strong enforcement measures. Fully support designation of Article 4 areas and use of Regulation 7 Directions.. Enforcement resources will be key to the success of DM13. Fully support Appendix A and B, although good practice examples would help. Could this approach be applied to HMOs elsewhere egg Morecambe?
Lancaster City Council Officer	Comment	Unsure how we can assess exceptional circumstances? Remaining residential properties may struggle to sell their properties for continued C3 use.
Resident	Comment	1.1 - Opening statement and student numbers is incorrect (web link provided). Other areas have HMO issues i.e. West End of Morecambe, Central and Bare areas. Students should start to transfer from terrace housing stock to 'purpose built' accommodation. Section 4.4 - scope of coverage should be extended to adjacent areas to avoid poor quality housing attracting minimum rent. 10% could create further clusters, a blended calculation may be better. Fully support the proposal to minimise impact of 'to let' boards. Query on students paying council tax.
	Support	Support restriction of 'to let' boards, do not think there is a need for them at all as most people look for housing online. High number of HMOs/students has led to no sense of community. Set up Lancaster City Centre Residents Association as didn't know neighbours/long term residents. Assume nothing can be done about current HMOs. Would appreciate if the council could put something in place to encourage/enforce landlords to maintain their properties. Need to protect Lancaster's heritage.

Resident	Support	Fully support all three proposals. Huge growth in HMOs has had a profound and largely negative impact on demographics and community cohesion. Anti-social behaviour, waste, parking, lack of maintenance issues create community tension. Also that students don't pay council tax. HMO areas are driving down the availability and desirability of city centre family homes.
Coal Authority	No comment	No comment.
	Support	University success has led to more students than available campus accommodation, as a result there has been an increase in HMOs and rents have become unaffordable for many families in need. Purpose built student accommodation rents need to be lower to encourage HMO owners to reduce rents or return homes to origin state. Councils will need to regularly inspect homes to maintain the proposed 10%. Existing landlords should also be required to meet the proposed standards. What action has been taken/will be taken to tackle the antisocial behaviour issues? Support the proposed restrictions on 'to let' signs.
	Comment	Suggested that the Norwich Stirling eco social homes approach should be considered (web link provided).
Environment Agency	Comment	Support the content of draft DPD and have made some comments on flood risk. Section 7 Living Conditions - would like to see provision to ensure increase in occupancy doesn't result in flood risk. Do not support ground floor sleeping accommodation in Flood Zone 3 and would not support if no open internal access to first floor. Suggested text for inclusion. Support designation of Article 4 as an opportunity to ensure that flood risk is not increased.

Green Door Lets	Qualified Support	HMO landlord - high concentration of undergraduates in the residential streets should be regulated, rather than the housing. HMOs offer housing for lots of other people egg some people want to downsize and HMOs offer this, affordable rent and company. Should specify what cupboard/fridge/freezer space is required per person, rather than limiting to 3 people. Needs to be in line with NPPF Section 5:61. Sections 20:41 and 20:42 are also relevant in terms of vulnerable people. Preference would be to allow 'for sale' boards but ban 'to let' boards (allow in window).
	Support	Fully support all three proposals. High concentration of HMOs in Coulston Road. No problems with students themselves but high density has led to low sense of community, lack of maintenance, noise, waste and parking issues. Other residents have difficulty in selling properties. Welcome proposed restrictions on 'to let' boards.
	Comment	Should clearly state the maximum size of signage allowed and penalties which will be imposed. Have suggested an interim approach to officers but unpopular. There should be a dedicated enforcement officer for this.
Resident	Support	Support proposal to restrict 'to let' boards, particularly in the Moorlands area. Positive about young people but need a balance to help to build a diverse and vibrant community. The Moorlands Community Group would like to revive community spirit, events have had to be postponed but a support leaflet has been distributed.
Lancaster City Centre Residents Association	Support	Lancaster City Centre Residents Association broadly support the proposal on restricting HMOs. Need to maintain a housing mix and ensure sufficient availability of affordable family homes. Minimum standards should be set for HMOs and regulated through council licensing. Question whether 'to let' boards are necessary when most look online. A detailed housing needs assessment on the type and sustainability of existing and future student accommodation needs and competency of providers is required. Support proposal to restrict 'to let' boards - should be required to remove after 2 weeks. Strongly recommend the examination of the use of council housing and other powers to tackle poor landlord management and the resulting environmental and antisocial behaviour problems.

Lancaster University Students Union	Comment	Lancaster University Students Union objects to the proposed introduction of Article 4 - suggest evidence is inadequate or incomplete. Restrictions in the number of HMOs would led to increased rents and reduced supply. Policy DM13 in the Local Plan already provides a way to control the number of HMOs. This policy should be reviewed in 12 months before Article 4 is considered. Granting flexible Class C3/C4 planning permissions in should be considered as an alternative. Student overwhelmingly find accommodation on line. It may be beneficial to restrict To Let signs across the district.
Lancaster University	Support	Lancaster University supports the proposal to improve HMO standards. 'Lancaster University Homes' ensures that existing HMOs meet current standards. The proposal was formally adopted in December 2019 and the standard will be updated following the outcome of this consultation and decision on proposed Article 4 and Regulation 7. Some students will always prefer to live in HMOs, therefore demand is likely to remain high, especially as this is affordable. However, a reduction in HMOs could cause rents to rise, which could impact on other rents. Concerned that proposals will put off landlords applying for the accreditation scheme. If restrictions are put in place, HMOs may be created in other neighbourhood's. Students support and boost the local economy. HMOs are also used by young professionals. If graduates can't find accommodation, it is unlikely they will stay post-university. Suggest the 10% threshold is flexible. Support the proposal to restrict 'to let' boards. Would like to meet with officers to discuss these proposals.
	Comment	Several specific questions about HMOs and new/continuing licenses.
Resident	Comment	Oppose purpose built student accommodation blocks. Students living in residential areas support the local economy.
Natural England	No comment	Natural England do not wish to comment because the supplementary planning document is not impact on the natural environment.

Lancaster Civic Society	Comment	Lancaster Civic Society support the proposal to restrict the number of HMOs. Categories of tenants should be omitted, west end tenants cannot be compared with South Lancaster. The Council should monitor and register the HMOs to provide exact figures. Standards for fire safety and overcrowded need to be considered. A clearer definition of HMOs should be provided. Should be creating 'good healthy communities', including students and academics. Should consider need for including family accommodation, student accommodation, rehabilitation accommodation for the homeless, single, retirement and downsize accommodation. Commend the use of proposed local legislation to achieve these ends, but expect such legislative policy to be informed by such statements of responsibility.
	Support	Support all three proposals, limiting the numbers will hopefully have some impact but fails to address issue of letting agencies buying up everything. Have experience of living next to and near student HMOs, as a result have moved out of the city centre. Lots of issues, original features list, parking, noise, litter, 'to let' signs.
	Support	Support all three proposals but not sure they go far enough. Concerned about HMOs in Allandale Gardens (landlord with long term tenants). DM13 should also apply to small HMOs and they should require a license. Article 4 should not be delayed, too much notice will mean C3 to C4 conversions will be created before planning permission is required. Hope something can be done about work in progress too. Regulation 7 should be applied to all Article 4 areas including Marsh Ward, Scotforth East Ward, Skerton West Ward and Skerton East Ward.
Lancaster Vision	Support	Lancaster Vision strongly supports all three proposals.
Lancaster Labour Party	Comment	Covering email for resident responses collected by Lancaster Labour Party.
Resident	Comment	No comment.
Resident	Comment	Too much saturation of housing and dodgy landlords/letting agencies.

Resident	Comment	Too many HMOs in Bowerham/Scotforth, causing waste issues. Purpose built accommodation should release houses for first time buyers.
Resident	Comment	Appreciate benefits that student bring but now purpose-built accommodation is available, houses should be released for others. Support restrictions on 'to let' boards that are an eye sore.
Resident	Comment	Should keep houses for residents and young people starting out.
Resident	Support	Support all three proposals. No need for student HMOs now purpose built accommodation is available.

Welfare and Community - Lancaster University's Students Union	Comment (suggest sign control should cover the whole district)	Overall, welcome the improvements for housing across the city. Responses are informed by various surveys. Para 1.1. Student HMOs do not contribute to 'seasonal depopulation'. Unsure that the proposals would help with 'poor condition accommodation' and current accreditation and licensing can help with this. Students add to and improve our vibrant community. Purpose built student accommodation had highlighted student accommodation to local residents. The majority of students live in small HMOs and choose these for various reasons. HMOs provide an affordable option for students, many cannot afford the purpose built accommodation. It is important that proposals do not increase rent or reduce choice for students as this can affect grades, wellbeing and experience. Need to be clear why 10% HMO is an imbalance in communities. Para 5.2. How will the impact on character of a building or area be measured? Para 7.14. Noise - the majority of students have not been involved in a complaint related to the council's environmental health team. Refuse, Recycling and bicycle storage - the majority of students did not have issues accessing these. Individual bike stores seems excessive for new HMOs. Car parking - students did not have an opinion on this or said there was adequate parking available. Families can also have multiple cars, parking issues are also caused by hospital users. Behaviour change to reduce carbon footprints should be considered. Para 2.11. HMOs have different impacts on the community depending in their size and tenants. Section 4 - Poor upkeep - students expect a high standard of maintenance, although the turnover of occupants impacts on this. The condition of housing will be more influenced by the Homes Act 2018 and licensing or accreditation schemes than planning permission. Rents - Do not believe HMOs are the cause of rent increases. Do not support how 'students HMOs' are referred to in documents. Not confident that proposals will tackle issues raised. Would like to work in partnership on this. Students support the proposed restrictions on 'to let' boards. Suggest that this should be applied across the whole district.
Kendal Resident	Comment	Concerned that class C3 properties could be used for 'Air 'B'n'B' type lettings.

Homes England	No comment	Homes England does not have any land holdings affected by the consultation and has therefore not commented.
	Support	Broadly support all three proposals. Essential to maintain a housing mix. HMOs are changing the character of the city and need to ensure affordable family homes are available. Support proposals on restricting the use of 'to let' signs. Council needs to explore powers to tackle poor landlord management and environmental problems.
City Councillor	Comment	Concern re saleability in Regent Street.
The Planning Station - a town and country planning and development consultancy	Comment	Bedroom floor areas seem excessively large. May led to configurations to get around this, which may lower standards incurring unnecessary costs and use of valuable resources.
Lancaster City Council Officer	Comment	Request to consider changing the restriction of To Let signs to include St Georges Quay, Willow Lane and Marsh Ward as these areas have increasing amounts of HMOs.

Appendix B: Publicity Methods

Methods	Main consideration
Documents made available for inspection	This is a minimum requirement as set out in the Regulations. Relevant documents will be made available for inspection during consultation period at the Council's offices in the Lancaster and Morecambe Town Hall and libraries in the Lancaster District. Public access to these documents is available via PCs in the reception areas
Website	Each consultation stage will feature prominently on the homepage of the council's consultation[1] and planning policy webpages. This will link directly to information on document production, providing access to the consultation material and advice on how and when comments can be made. Articles providing updates on plan production, which may include consultation and engagement opportunities, may be published in the Council's online news section periodically but it will not be solely relied upon as a means of communication.
Adverts/public notices	Notices will be placed in a local newspaper advertising consultation and engagement opportunities, where appropriate. Statutory requirements to publish notices advertising certain planning applications
Mailing List – Email / Letter	The Council operates a database of individuals and organisations that have expressed an interest in the plan-making process, have previously been actively involved in policy development or are statutory consultees. Those who wish to be involved will be directly notified at each stage either through email or letter of opportunities to comment. Those who are interested in planning policy development and wish to be notified can be included on the Council's mailing list at any time[2]
Press release	To be undertaken in accordance with the Councils media team, Media briefings/press releases will be issued to local media. Although items may only be reported if they are considered newsworthy by the newspaper editors, therefore publication is not guaranteed.
Parish and Town Council and Community Group publications	These types of publications are distributed to local residents at least quarterly. The Council will work with relevant organisations to utilise these publications to notify residents of consultation and engagement opportunities, where possible. Consideration will need to be given to the timing of the consultation, and the timing and circulation of any publications outside the Council's control.
Posters	Posters may be sent to relevant Parish and Town Councils and libraries to be displayed on notice boards to raise awareness of any

[1] www.lancaster.gov.uk/consultation
[2] www.lancaster.gov.uk/ppc

Methods	Main consideration
	public consultation and engagement opportunities. Posters may also be displayed in other appropriate locations across the District.
Leaflets	Leaflets may be used to gain wider public awareness of a consultation or engagement opportunity, for example leaflets may be distributed at key attractors/destinations such as train stations and local schools.
Social Media	Media such as Twitter and Facebook will be used to highlight public consultations on planning policy documents with direct links to the Council's website and information on how to comment, and any engagement events. Such messages may be retweeted periodically throughout the consultation period[3]. However, comments will not be accepted via social media.
Events	Such events may include drop-in sessions, public exhibitions and/or targeted workshops. Parish and Town Council meetings will be utilised where possible. The type of event undertaken will be dependent on a number of factors, including the consultation stage, and time and resource constraints. Careful consideration will be given to the timing, venue and format of events to ensure accessibility and inclusivity.
Key stakeholder Groups	We will liaise with key stakeholder groups at key stages in the plan making process, to discuss issues and keep them informed of progress.
Questionnaires / surveys	Questionnaires / surveys may be used to focus comments and to help ensure that feedback relates to issues that are within the scope of the document being consulted upon.

[3] twitter@lancastercc