

**Houses in Multiple Occupation
Direction under Article 4 of the
Town and Country Planning
(General Permitted Development)
(England) Order 2015, as amended**

Consultation Statement

Updated January 2021



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1. Introduction

- 1.1 This Consultation Statement sets out how the Council considers it has fulfilled its duty to consult and engage with the stakeholders in the preparation of a Direction under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.
- 1.2 A Direction under Article 4 removes permitted development rights, in this instance it is proposed to remove the right to convert a dwellinghouse (Use Class C3) into a House in Multiple Occupation (Use Class C4) within the wards which form Lancaster city plus the village of Galgate. The Background Paper on the Designation of Article 4 Areas to Control Houses in Multiple Occupation provides the justification for the proposals.
- 1.3 The Houses in Multiple Occupation Article 4(1) Direction 2020 was made on the 10th November 2020. Formal consultation then took place as required by Schedule 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. The outcome of this consultation and the previous informal consultation will be considered when determining whether to bring the proposed Article 4 into force.

2. Purpose of this document

- 2.1 This Consultation Statement provides a summary of the stages of engagement and consultation which the Council has undertaken in order to inform the preparation of the proposed Article 4.
- 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 at the informal consultation stage
 - Section 7: What issues were raised at the statutory consultation stage
 - Section 8: How the issues were addressed

3. Who we consulted

- 3.1 The Council has 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 proposed Article 4:
 - The purpose of the Article 4, how and when they may be affected and whether the Article 4 should be brought into force.
 - How and when they can comment on and get involved and what they can and can't influence.
 - How and when their comments will be taken into account by the Council and when they can expect feedback; and
 - The remaining stages in preparing of the Article 4 and further opportunities to comment.
- 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 in preparing planning document and in considering planning applications. It identifies who we engage with. The table below is not exhaustive and is amended or added to as required.

3.3 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 | |
| Post Office | |
| Secretary of State for Housing, Communities and Local Government | |
| 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 3 rd Sector Advocate groups Educational establishments Government organisations (NHS) Lancaster University Homes |

4. What we consulted on

Consultation - February 2020

- 4.1 For a six-week period between 21st February and 3rd April 2020 the Council carried out public consultation on:
- The introduction of an Article 4 to remove permitted development for the conversion of a dwellinghouse (Class C3) to a House in Multiple Occupation (Class C4) in the wards within the city of Lancaster and the village of Galgate;
 - A Draft Residential Conversions and Houses in Multiple Occupation Supplementary Planning Document (SPD);
 - The introduction of a Regulation 7 Direction to control the display of To Let Boards.
- 4.2 The aim was to carry out early consultation with stakeholders and provide an informal opportunity for comments on the proposed Article 4 in addition to the formal consultation following an Article 4 being 'made'. The aim was also to gather feed-back on the draft SPD and the possible introduction of a Regulation 7 Direction to manage the concentration of To Let signs within the city of Lancaster.

Consultation – November 2020

- 4.3 For a six-week period between 11th November and 23rd December 2020 the Council carried out public consultation in accordance with Schedule 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.
- 4.4 The consultation sought views on whether the proposed Article 4 should be brought into force.

5. How we have engaged

- 5.1 Table 5.1 below outlines the consultation methods adopted for consultation.

| Requirements of Regulation | How the Council satisfied the requirement |
|---|--|
| Which bodies and persons the local planning authority invited to make representations | <p>Consultation Database (www.lancaster.gov.uk/ppcl) consultees were notified on the opportunities to participate in preparation of the Article 4.</p> <p>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.</p> <p>Presentation and Q&A via the Lancaster University Homes Webinar for landlords of student accommodation 12th August 2020.</p> |
| How those bodies and persons were invited to make representations. | <p>Informal consultation ran for 6 weeks, between 21st February and 3rd April 2020 and statutory consultation for 6 weeks between, 11th November to 23rd December 2020</p> |

| Requirements of Regulation | How the Council satisfied the requirement |
|--|---|
| <p>Informal Consultation – February 2020</p> <p>There is no requirement to carry out this stage of consultation</p> | <p>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 in February 2020.</p> <p>Emails were sent to over 2,200 consultees on the planning policy consultation database.</p> <p>Posters were placed in 20 locations around Lancaster City and in Galgate, and over 80 posters were sent to venues in the area to ask them to display on notice boards.</p> <p>An 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 addition to the Council's agreed publicity procedure.</p> <p>Information on the consultation was published on the Council webpages and copies of the consultation documents were made available at the 'Principal Offices'.</p> <p>Further details on the publicity methods are set out in more detail within Appendix C</p> |
| <p>Statutory consultation 11th November to 23rd December 2020 (6 weeks)</p> <p>The requirements are set out in Schedule 3 of the Town and Country Planning (General Permitted development) Order (England) 2015 as amended include:</p> <ul style="list-style-type: none"> • Local advertisement • At least 2 site notices • Notice to the Secretary of State • Notice to the County Council • Statutory consultees | <p>This included a period of publicity across the Lancaster District, with a public notice placed in Lancaster Guardian (a local newspaper) on 12th November 2020.</p> <p>Emails were sent to over 2,200 consultees on the planning policy consultation database, statutory consultees and the Secretary of State for Housing, Communities and Local Government.</p> <p>Posters were placed in 38 locations around Lancaster City and in Galgate. A list of the locations is provided at Appendix D</p> <p>An email (bcc) was sent to known letting agents advising of the consultation. It is acknowledged that not all agents may have been captured. The notification was however, in addition to the Council's agreed publicity procedure and the statutory requirements.</p> <p>Information on the consultation was published on the Council webpages, social media and copies of the consultation documents were made available at the 'Principal Offices' on an appointment basis.</p> <p>Further details on the publicity methods are set out in more detail within Appendix C</p> |

| Requirements of Regulation | How the Council satisfied the requirement |
|---|---|
| A summary of the main issues raised by the representations made | <p>The main issues raised in the representations are summarised in Section 6 and Section 7 of this document.</p> <p>Full details on the main issues raised are set out in Appendix A: Summary of Consultation Responses 21st February 2020 to 3rd April 2020 and Appendix B: Summary of Consultation Responses 11th November 2020 to 23rd December 2020</p> |
| How the Council has responded | <p>The Council has responded to comments submitted to the Council following the periods of consultation. Replies also outline how the comments have informed the proposed Article 4.</p> <p>Section 8 outlines how these issues have been addressed.</p> |

6. What issues were raised at in the Informal Consultation Stage?

6.1 The informal consultation on the proposed Article 4 provided the first opportunity for members of the public and interested parties to comment on the proposals. As the consultation related to the proposed Article 4, SPD and Regulation 7 Direction the range of responses received were varied and the level of detail provided extensive. There were 99 separate consultee responses to the three proposals and 84 in respect of the proposed Article 4.

- 72 respondents were in support of the proposals. Support came predominantly from residents and also from 4 Councillors, the MP for Lancaster and Fleetwood, Lancaster Civic Society, Lancaster City Centre Residents Association, Lancaster Vision and Lancaster Labour Party.
- 8 respondents objected to the proposals, including 4 residents, 1 agent, Lancaster University, Lancaster Students Union and the Welfare and Community - Lancaster University's Student Union.
- 4 respondents made comments, but it was unclear whether these were in support of or objecting to the proposal.

6.2 A number of trends and patterns in respect of the impact of HMOs and the proposed Article 4 can be seen.

Adverse Impact of HMOs

- There has been a significant increase in the number of HMOs;
- The high concentrations of HMOs have resulted in there no longer being a balanced mix of households and community spirit has suffered;
- Waste, noise and parking issues;
- Anti-social behaviour;
- Areas with high concentrations of HMOs have service and amenity issues;
- Some landlords do not maintain properties, properties are untidy;
- HMOs affect the ability of residents to sell their homes;
- HMOs command high rents which can exclude those on low incomes.

Support for Article 4

- Restricting the number of HMOs would help to retain family housing;
- It is important to keep a balance of households;
- There is plenty of student accommodation, there shouldn't be a need for more in residential areas;
- An Article 4 should not be delayed to avoid a rush of conversions;
- The Article 4 should be district wide, the area should be extended as students could transfer out to other areas;
- There should be a halt on new HMOs and a policy of reversal to bring HMOs back into houses for local residents.

Objections

- Students provide vital support for the housing market;
- Students aid and improve a vibrant economy;
- HMOs provide an affordable option for many students;
- Much of the new student accommodation is too expensive;
- Purpose built student accommodation is the problem not HMOs;
- The proposals will increase rents and reduce supply;
- Students do not contribute to the issues raised;
- Families also have multiple car and parking problems caused by hospital;
- Concerned the proposals will put off landlords applying for University accreditation scheme;
- HMOs are also used by young professions and graduates are unlikely to stay in Lancaster if accommodation not available;
- The concentration of students should be regulated not HMOs;
- The city centre includes many commercial buildings in where families would not wish to live, conversions should be supported to bring empty properties back into use and for regeneration;
- It will be harder for long term residents to sell.

Comments on the Background Paper, Extent of the proposed Article 4 and the Process

- The evidence base is inadequate and incomplete;
- The density has been underestimated;
- The effect of DM13 should be reviewed in 12 months before Article 4 is considered;
- Anti-social behaviour of students should be dealt with by the university it should not be a problem for the local authority to deal with alone;
- Home-owners should be given 2/5 years to sell;
- The area of the Article 4 should be district wide/it should not include the city centre.

6.3 The responses specifically in respect of the proposed SPD and the Regulation 7 Direction have been omitted from the consultation summary. These issues have been addressed separately as those proposals have progressed.

7. What issues were raised at in the Statutory Consultation Stage?

- 7.1 The Houses in Multiple Occupation Article 4 (1) Direction 2020 was made on the 10th November 2020. The statutory consultation was carried out as soon as practicable after the Article 4 was made and in accordance with the Town and Country Planning (General Permitted Development) Order (England) 2015, as amended. This consultation sought views on whether the Article 4 should be confirmed and brought into force on the 10th November 2021.
- 7.2 Despite the extensive publicity only 11 responses were received to the statutory consultation between 11th November and 23rd December 2020. The response rate may have been affected by the Covid restrictions in place at the time. The consultation undertaken did however make use of virtual methods of communication using email and the council website. The restrictions allowed residents to exercise close to where they live and the numerous the site notices displayed would have been visible to people passing by. The Government has advised that local planning authorities should continue with day to day activities to support the economy and their communities during the pandemic.
- 7.3 9 of the responses supported the introduction of the Article 4 to control HMOs, 1 objected to the proposal and the other commented it was pointless. The comments raised predominantly related to the impact that HMOs have upon the amenity of permanent residents, communities, affordability and availability of family homes.

8. How these issues can be addressed

1. The differing opinions with regard to the impact of HMOs;
 2. The evidence base;
 3. Delay in bringing an Article 4 into force;
 4. Extending the proposed Article 4 to district wide;
 5. Regeneration opportunities in the City Centre;
 6. Ability of residents to sell;
 7. The impact on supply and cost of student accommodation;
 8. Adverse impact of HMOs.
- 8.1 As highlighted in Sections 6 and 7 of this statement, the Council received a range of responses to the proposed Article 4. The following paragraphs explain how these issues have been addressed.
1. The differing opinions with regard to the impact of HMOs
There are understandably differences in opinion between the student community, represented by Lancaster University and the Students Union and long-term residents. The issues have been raised over a period of many years by long-terms residents and Councillors and formed the basis for introducing policy DM13 within the adopted Local Plan. The policy, and its reference to the proposed Article 4, has been through several consultation processes and an examination in public. The difference in opinion cannot be reconciled and it is considered that there is sufficient evidence with regard to the densities of HMOs in the city to proceed with making an Article 4.
 2. The evidence base
It is acknowledged that the evidence base is not 100% accurate and that student council tax exemptions will only provide part of the overall picture. The evidence base is however as comprehensive as the Council can provide based upon the data available. Agents will be

asked to register HMOs before an Article 4 comes into force, this will improve the evidence base and provide a reference point for enforcement should future complaints with regard to lawful HMOs be made. Once an Article 4 is in force, the evidence base will be updated as new small HMOs are permitted, improving its accuracy.

3. Delay in bringing an Article 4 into force

Contradictory comments were received stating that the delay is too long and that not enough notice will be provided. The consultations in February 2020 and the period between an Article 4 being made and coming into force, will have provided approximately 20 months between the proposals being made public and an Article 4 coming into force. The proposed non-immediate Article 4 will provide a year between the Article 4 being made and it coming into force. A year between an Article 4 being made and coming into force appears to be best practice followed by many authorities when introducing an Article 4. This will ensure that owners have enough time to be made aware of the restrictions, make provisions if they wish to do so and to limit potential compensation claims.

It was also commented that the effect of policy DM13 should be assessed prior to considering the introduction of an Article 4. As DM13 will only influence the HMOs which require planning permission, its impact will be limited. As can be seen from the data in section 3 of the 'Background Paper on the Designation of Article 4 Areas to Control Houses in Multiple Occupation', there is a wide disparity between the numbers of HMOs which require licensing and the number of potential HMOs with council tax exemptions. As only the HMOs with more than 6 occupants would have required planning permission, the disparity between those that would have required planning permission and those that did not, would be even greater. Delaying the introduction of an Article 4 further will allow concentrations of small HMOs to continue to increase, contrary to the aims of policy DM13.

4. Extending the proposed Article 4 to district wide

HMOs are not concentrated in other parts of the district in the way that they are in Lancaster, there is therefore not the evidence, as required by the NPPF, to justify inclusion of additional areas. Issues arise in Morecambe with many small HMOs providing poor quality accommodation. The issues differ from those in Lancaster and will be considered separately.

5. Regeneration opportunities in the City Centre

The potential for HMOs providing regeneration opportunities and the re-use of vacant properties in the City Centre is recognised. The Council wish to encourage a variety of uses, re-use of premises above shops and businesses and student accommodation into the city centre to enhance vitality and viability. However, the proposed Article 4 would have little effect upon such opportunities. Class L(b) of the Town and Country Planning (General Permitted Development) Order 1995, permits the conversion of dwellinghouses (Class C3) into HMO's (Class C4). The Order states that a 'dwellinghouse does not include a building containing one or more flats, or a flat contained within such a building'. The conversion of a flat above a shop or business, or in a block of flats would therefore require planning permission regardless of an Article 4. Planning permission is also required for the conversion of commercial premises to HMOs.

There are some houses within the more residential parts of the city centre, which warrant the same consideration as residential areas elsewhere.

An Article 4 does not mean that planning permission will not be granted for the conversion of a property into an HMO. Policy DM13 provides a threshold of 10% but the policy allows for exceptions. Exceptions may include where proposals are within the city centre, where they may be high numbers of HMOs mixed with commercial property, and where the proposal would not adversely affect amenity, the policy. An Article 4 would not alter this consideration.

It is therefore not considered appropriate to exclude the city centre from the proposed Article 4.

6. Ability of residents to sell

The time period between the first consultation in February 2020, the date on which an Article 4 is made and it come into force, will provide homeowners with an opportunity to sell without restriction.

Once an Article 4 has come into force, it could have differing impacts on saleability depending upon the location and number of HMOs in the immediate area. In some cases, properties may sell more easily, as potential residents will have confidence about the density of HMOs which may or may not be permitted. In other places, such as where a home is in a street with a very high density of HMOs and a house is sandwich between several HMOs it may become more difficult to sell for a C3 use. Policy DM13 includes criteria for such cases and the draft Residential Conversions and Houses in Multiple Occupation Supplementary Planning Guidance expands on this, stating that where a property has been marketed at a reasonable Class C3 value, an exception to the 10% may be made (subject to other criteria).

The aim of policy DM13 and the Article 4 is however, to balance communities and it is important to ensure that properties remain in a C3 use, unless the criteria within policy DM13 are met.

7. The impact on supply and cost of student accommodation

The proposed Article 4 will not reduce the number of HMOs available within the city, nor will it prevent any new HMOs. Together with policy DM13 it will allow a means to control the distribution. It should also be noted, that in recent years, while Lancaster University has expanded, the number of students attending Cumbria University in Lancaster has reduced. It is therefore not considered that the proposed Article 4 will reduce the availability and affordable housing in the city or student HMOs.

8. Adverse impact of HMOs

An Article 4 cannot itself address some of the issues raised such as those concerning noise, anti-social behaviour, waste and parking. It can however provide the Council with the means to properly consider the implications of new HMOs, avoid excessive concentration and monitor distribution and the effects they have.

Appendix A: Summary of Consultee Responses 21st February 2020 to 3rd April 2020

| Resident/Agent/Landlord | Support/Object/Comment | Summary of Comment |
|-------------------------|------------------------|---|
| Resident | Support | 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 | 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. Planning permission should be required for the conversion of properties to HMOs. There should be halt on HMOs and a policy of reversal should be implemented to put housing back in to local residences and reduce the number of HMOs to 10% in any street. 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. |
| Resident | Support | Has been suggesting regulation for a long time. The density has been underestimated on Golgotha Road and probably others. 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. Parking restrictions could help improve the issues caused by cars from HMOs, other residents and the University. |

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| Resident | Object | 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 commercial streets and not where families want to live. Many conversions are the upper floors or commercial property and the conversion of redundant and underused property is a good thing. |
| 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 e.g. 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. |
| | Support | The proposals will greatly improve community cohesion. |
| Resident | Support | Support all three proposals. As a former student, now resident, who has lived in a number of HMOs, I think this is deeply in the interests of both HMO and non-HMO residents. 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. It is important to hold landlords to account and keep the right balance of housing provision. |
| City Councillor | Support | Support all proposals including restriction on numbers of HMOs, requiring planning permission for HMOs. |
| | Support | Support all three proposals and they need to be introduced asap. |

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| Resident | Support | 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 e.g. 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 | Support | 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 | Support | 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 e.g. 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. |

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| Resident | Support | 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 e.g. 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 e.g. noise, waste and parking. |
| Resident | Support | High density of HMOs without planning permission, stopping families buying properties and causing issues e.g. waste and parking. Letting boards devalue houses and discourage other families living in the areas. |
| Resident | Support | Support proposal to restrict density of HMOs. |
| Resident | Support | I support the proposals that HMOs of whatever size should require planning permission. The requirements should however extend across the whole district and disagree with the 10% in 100m limit. Student accommodation blocks are not the best solution. |
| Resident | Support | 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. |
| Resident | Support | 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 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. |

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| 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. An Article 4 should not be delayed to avoid a rush of conversions, this consultation should suffice in terms of notice. |
| 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 e.g. waste, noise and lack of maintenance. Supported purpose-built accommodation to help with these issues. HMOs also impact on resident's 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 | Support | 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. |

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| Resident | Support | Support proposals. Enjoy having student neighbours but HMOs cause various issues e.g. waste and parking. |
| Resident | Object | 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. |
| 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 | Support | 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 | Support | Support the proposals which positively respond to the issues being raised by residents. |
| Resident | Support | 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. |
| Resident | Support | 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 | Support | High density of HMOs has led to low availability of affordable homes for people on low incomes. |
| Resident | Support | Mixing students and residents has led to anti-social behaviour and parking issues. |
| Resident | Support | 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. |

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| Resident | Support | 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. Properties stand empty for weeks and attract vandals. |
| Resident | Support | Agree the number of HMOs should be regulated. Young people struggle to find cheap affordable housing. |
| Resident | Support | Agree with the proposals. Too many houses have been taken over by students making it difficult for local residents to get on the property ladder. |
| Resident | Support | HMOs should require planning permission in order to protect areas. |
| Resident | Comment | An Article 4 should be carefully considered. There is a benefit in limiting HMOs but a better approach would be to fine landlords for not providing adequate accommodation or maintaining their properties. Disappointed at the focus on students, large families can cause similar problems. |
| 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 | 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 | Object | Object to the proposed restrictions on HMOs. Purpose built student accommodation is the problem, social housing should be being built instead. |

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| Resident | Support | 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 and think this should apply to all house sizes. Car parking, rubbish and general untidiness are problems. |
| Resident | Support | Long overdue. |
| Resident | Support | Long overdue. There is always worry and uncertainty at the beginning of a new term. Landlords have no concern over external appearance and tidiness of properties. Difficult for families when it is noisy at night. |
| Resident | Support | 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. An increasing number of properties are being converted into HMOs. |
| Freelance Planner | Support | Action should have been taken earlier, however this is an opportunity to address issues to the benefit of the wider community. The proposals will 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. Enforcement resources will be key to the success of DM13. |
| Resident | Support | The policy should have been developed and enforced several years ago. Certain parts of the city are now significantly "student" areas and this has been to the detriment of the local population and housing stock. I recall the Lancaster University claiming that student accommodation was now at "saturation point" in response to the application for Student Halls and the former Scotforth water works site. |

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| | Support | Welcome proposals to limit HMOs. HMOs and student accommodation have crushed any sense of community within the area. Lancaster City Centre has been over run by student accommodation and HMOs. Many landlords do not maintain properties which has a negative impact. 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 | 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. My concern is about the unfettered growth and concentration of HMOs in residential areas without any consideration of their deep impact on the quality of life, nature and future of these neighbourhoods. HMO areas are driving down the availability and desirability of city centre family homes. |
| | 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. The Council must do as is proposed and introduce much tighter planning regulations to restrict the creation of more HMOs especially (but not only) in areas already overloaded with such student-let properties. They are damaging the amenities and almost certainly the market value of privately-owned family homes in those neighbourhoods. Purpose built student accommodation rents need to be lower to encourage HMO owners to reduce rents or return homes to original state. Councils will need to regularly inspect homes to maintain the proposed 10%. What action has been taken/will be taken to tackle the antisocial behaviour issues? |
| Owner/Agent | Object | The issues identified are more to do with the high concentration of young people, it should be the number of undergraduates in the residential streets that are regulated, rather than the housing. HMOs offer housing for lots of other people e.g. some people want to downsize and HMOs offer this, affordable rent and company. |

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| | Support | Fully support all three proposals. The high density has led to low sense of community, lack of maintenance, noise, waste and parking issues. Other residents have difficulty in selling properties. HMOs mean less housing for families and young people. |
| Resident | Support | 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. The area can support a proportion of students, but we need children and families. |
| Lancaster City Centre Residents Association | Support | Lancaster City Centre Residents Association broadly support the proposal on restricting HMOs in and close to the city centre. Need to maintain a housing mix and ensure sufficient availability of affordable family homes. The increases in rental properties particularly for student housing are adversely changing the character of the city. There is need to ensure sufficient availability of affordable family homes which are at risk of being lost to the uncontrolled expansion of student accommodation. We recognise the immense contribution the Universities and the student population play in the economy and culture of the Borough and beyond. We support proposals to provide purpose-built or purpose-converted student accommodation in appropriate locations. Minimum standards should be set for HMOs and regulated through council licensing. A detailed housing needs assessment on the type and sustainability of existing and future student accommodation needs and competency of providers is required. 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. |

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| Lancaster University Students Union | Object | Lancaster University Students Union objects to the proposed introduction of Article 4 - suggest evidence is inadequate or incomplete. HMOs are an important affordable source of accommodation. Students contribute to the economy. Restrictions in the number of HMOs would lead 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. |
| Lancaster University | Object | Student numbers in Lancaster have shown an increase over recent years, especially international students, with an anticipated increase of up to 4,000 new students by 2025 from the UK and abroad. Some students will always prefer to live in HMOs, therefore demand is likely to remain high, especially as this is affordable. A reduction in HMOs could cause rents to rise, which could impact on other student 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 neighbourhoods. 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. City Centre student accommodation prevents decline and maintains vibrancy in key areas of Lancaster City Centre |
| Resident | Object | Oppose purpose built student accommodation blocks and in favour of students living in residential areas support the local economy. |

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| Lancaster Civic Society | Support | Lancaster Civic Society support the proposal to restrict the number of HMOs. Recognise that HMOs are cheaper than purpose-built accommodation and students will wish to live in residential streets. There are also social benefits to shared accommodation such as support networks and there are benefits to the local community in having students in the local housing mix. There are however so many HMOs there are probably sufficient. The Council should monitor and register the HMOs to provide exact figures. 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 proposals to limit 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 lost, parking, noise, litter, 'to let' signs. |
| | Support | The 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. |
| Lancaster Vision | Support | Lancaster Vision strongly support the proposals to restrict concentration of HMOs and the Article 4. |
| Resident | Support | No comment. |
| Resident | Support | Too much saturation of housing and dodgy landlords/letting agencies. |
| Resident | Support | Too many HMOs in Bowerham/Scotforth, causing waste issues. Purpose built accommodation should release houses for first time buyers. |

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| Resident | Support | Appreciate benefits that student bring but now purpose built accommodation is available, houses should be released for others. |
| Resident | Support | 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 | Object | The response is informed by various surveys. 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. 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. 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. Car parking - students did not have an opinion on this or said adequate parking was available. Families can also have multiple cars and parking issues are also caused by hospital users. HMOs have different impacts on the community depending in their size and tenants. 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. Evidence shows that the quality of accommodation affects grades Rents - Do not believe HMOs are the cause of rent increases. Do not support how 'students HMOs' are referred to in documents. We must do all that we can to resist harmful student stereotypes that envision an 'us vs them' mentality. This includes not pushing students in to PBSA if they prefer to live within the community. HMOs allow students to experience independent living without living alone. Students are a valued part of Lancaster City. Not confident that proposals will tackle issues raised or that there is justification for an Article 4 as required by the NPPF. |
| Kendal Resident | Comment | Concerned that if owners cannot convert to HMOs they will revert to Air B & B. |

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| | Support | Essential to maintain a housing mix. HMOs are changing the character of the city and need to ensure affordable family homes are available. Council needs to explore powers to tackle poor landlord management and environmental problems. A detailed housing needs assessment on the type and sustainability of the existing and future student accommodation needs and, on the quality, and competencies of landlord providers is a prerequisite in fulfilling the housing needs projections of the Council's Local Plan. |
| City Councillor | Comment | Highlighting a residents concern re saleability. |

Where a respondent type has not been noted, the respondent did not provide details.

Appendix B: Summary of Consultee Responses 11th November 2020 to 23rd December 2020

| Support/Object/Comment | Summary of Comment |
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| Support | HMOs are de facto businesses with the potential to impact greatly on neighbours. Therefore they should be subject to this additional regulation. |
| Support | I am in full support. We have recently moved onto a new development and eight of the adjacent houses have been turned into HMOs and are occupied by students. We have had endless problems associated with noise, drugs, waste/recycling and car parking as a result. An abundance of HMO properties, mostly aimed at students, means less family homes are available on the rental market and when they go up for sale, they are snapped up by those with property portfolios for use as HMOs. We used to be students in Lancaster and have decided to remain here for the past 6 years and would like to purchase our own home in Lancaster - we consider it as our home and recognise the contribution students make to the economy and culture in Lancaster but now there are several purpose-built developments there is no need for the use of ordinary housing to be occupied by them. Unfortunately, we may be forced to move elsewhere to be able to afford to buy a family home and because we do not wish to be surrounded by students when bringing up a young family. In my experience, landlords of student properties do not follow up on complaints about their tenants and see their anti-social and often illegal behaviour 'as part of university life' but this does not create a community feel amongst residents. |
| Supporting | The number of HMOs on the street, and the Moorlands area in general has increased considerably. The increase in HMOs has also had a substantial effect on the number of cars parked in the local area on streets. Many occupants have their own cars so the narrow streets have become crowded. |
| Comment | There is little point in any HMO regulation scheme when the council works hand in glove with letting agents. I have experienced a significant failure in this way. This is bad for Lancaster and depreciates the value of properties in the town. |
| Support | I agree that the multiple occupant housing which is spread across the city can be a problem. While not all students are bad neighbours, there are quite a few who cause problems for permanent residents. Both noise and littering can be an issue in some residential areas. |

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| Object | <p>I'm rather alarmed by the notion of restricting HMOs in the city. Largely because I think the council's argument is very poorly substantiated. I have lived in Lancaster for 2 years for University and would choose to remain here if a job came up locally. The University is the 2nd largest employer in Lancaster. I accept issues inevitably exist but I would wager that such issues are the exception not the rule. I have not experienced social polarisation to a significant degree I feel like many students in that we have become adopted Lancastrians. It's our city as well and it is highly problematic to see our council (which many of us vote for, some pay council tax) engagement in studentphobia is counterintuitive. Surely the best solution is to better protect the existing relationship between different stakeholders to prevent issues? It's in the economic interests of the city.</p> |
| Support | <p>As a homeowner living in Moorlands I would very much support council control of student and multiple occupation houses in my street and surrounding streets. Whilst many students are considerate neighbours, they are inevitably short-term occupants, and so cannot contribute to creating a community in this area, as opposed to other resident owners and those renting houses long term. Their lifestyles are inevitably different from those of us who are retired or busy working too. Many residents in this area start work early, and work long hours, whereas students have busy, and often noisy evening lives, and many like partying and coming home in the early hours. They are not invested in supporting the community, and houses are often empty outside term times. I would prefer to see these houses being lived in and maintained by families and other residents, especially those who cannot afford to buy their own houses.</p> |
| Support/Comment | <p>The coronavirus crisis has highlighted the vast number of student multiple occupancy houses in the Bowerham area as indicated by the huge number of student let boards currently on display. Whilst I have no problem with students themselves, I believe that multiple occupancy student housing is damaging to neighbourhoods. Student houses by their very nature will have a high turnover of occupants and are unoccupied for around three months of the year. This means that whole neighbourhoods have been destroyed. If we moved students into the many newly erected purpose build developments, these houses could be converted back into great family homes and could in turn restore communities within the city of Lancaster.</p> |
| Support | <p>This is essential to allow the Council to take control of HMOs and build back real community in residential areas and in the city centre.</p> |

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| Support | <p>When I first visited Lancaster I noticed was the huge amount of To let signs all over town. I am a student but have moved in with a friend long term now so will be here for the considerable future. As a student I can say I was never enticed by to let signs on houses and always looked online when looking for houses. I also lived in a house that was not full, meaning there probably isn't a demand for new properties. I think limiting the number of new small HMOs you are freeing up the market for more first-time buyers as smaller houses become available to buy or as people move up the property ladder. It would also allow for more private rent properties to be available for locals.</p> |
| Support | <p>I support the Council's proposals for restricting the expansion of houses in multiple occupation and student housing in Lancaster. It is essential to maintain an appropriate housing mix and the overall character of the Borough's residential areas to bolster their image the security of both existing residents and future incomers wishing to move into the district. There is need to ensure sufficient availability of attractive affordable family and mixed homes which now are at risk of being lost to the uncontrolled expansion of student accommodation. In terms of protecting and enhancing the quality of life and character of existing neighbourhoods I strongly commend the City Council for adopting these measures to tackle poor landlord management, inappropriate behaviour by tenants, environmental problems and help build stable and resilient housing neighbourhoods in the urban area of the city.</p> |

Appendix C: Publicity Methods

| Methods | Main consideration |
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| 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 Council's 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 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 |

| Methods | Main consideration |
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| | 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. |

Appendix D: Location of Site Notices

Site Notices Displayed 11th November 2020

Bulk Ward

Patterdale Road – lamppost adjacent bus stop near shops
Gladstone Terrace – centre end
Ulswater Road – outside Luckeysz Food Store
Moor Gate/Ulswater Road – outside The Britannia
Traffic sign adj pedestrian access to Sainburys, cable Street
Langdale Road. Opposite Newton Stores, Langdale Place

Castle Ward

Lancaster Boys & Girls Club, Dallas Road
Dallas Road Primary, High Street
Dallas Road/Meeting House Lane
Lamp post at entrance to Aldi on Aldcliffe Road
Lamp post outside Palatine Hall, adj pedestrian crossing (town centre)
Post outside Lush, Penny Street (town centre)

John O Gaunt Ward

Balmoral Road – bus stop outside Cathedral Primary School
Quarry Road – adj Moorlands Hotel sub station
Junction of Bowerham Road/Prospect Street/St. Oswald Street, outside the Park public house
Bowerham Road/Coulston Road – near Spar

Marsh Ward

Lancaster City Football Club
Willow Lane Primary
Westbourne Road/Sibsey Street
New Quay Road, outside marketing suite

Scotforth East Ward

Bowerham Road – outside Moorside Primary School
Bowerham Primary School
Scotforth Road – lamppost on corner adj Booths
Hala Aqure, outside shops

Scotforth West Ward

Scotforth Road – outside Greaves Pharmacy
Greaves Road, Spar
Springfield Street/South Road
Pointer Roundabout, Ashton Road corner

Skerton East Ward

Lune Street
Sylne Road – lamp post outside Spar adj pedestrian crossing
Aldrens Lane, no stopping sign outside St. Joesphs School
Slyne Road – no stopping sign outside St Lukes Primary

Skerton West Ward

Ryland Primary School, Torrisholme Road, no stopping sign
Torrisholme Road, bus stop adj Ingleborough Road
Morecambe Road/Penryn Road
Scale Hall Lane, lamp post outside Spar adj bus stop

Galgate Ward

Outside the Spar
End of Chapel Lane – give way sign