

**Residential Conversions and Houses in
Multiple Occupation Supplementary
Planning Document (SPD)**

Consultation Statement

October 2020



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1. Introduction

- 1.1 This Consultation Statement has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Statement sets out how the Council considers it has fulfilled its statutory duty to consult and engage with the public on the preparation of the new Residential Conversions and Houses in Multiple Occupation Supplementary Planning Document) (SPD))
- 1.2 Supplementary Planning Documents (SPDs) relate to specific sites or specific planning issues. Unlike Development Plan Documents, they are not subject to Independent Examination and do not have Development Plan status. However, SPDs are given due consideration within the decision-making process and must relate to a specific Development Plan policy contained within a DPD. The Council will seek to prepare SPDs where it considers it to be necessary and appropriate and where it complements the overall Development Plan process.
- 1.3 The Residential Conversions and Houses in Multiple Occupation SPD provides guidance on the implementation of policy DM13: Residential Conversions, in the Development Management Development Plan Document.

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 Residential Conversions and Houses in Multiple Occupation SPD and to address the requirements of national planning legislation.
- 2.2 For each stage of consultation, 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 Pre-Regulation 12 public participation stage
 - Section 7: What issues were raised at the Regulation 12 public participation stage; and
 - Section 8: 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 content of the of the SPD and to make clear:
 - The purpose of the SPD, the process of preparing it and how and when they may be affected;
 - How and when they can comment on and get involved in preparing the SPD 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 the SPD 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 a SPD 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 consulted 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, Vodaphone, 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

Who we consulted	
	3 rd Sector Advocate groups Educational establishments Government organisations (NHS) Lancaster University Homes

4. What we consulted on

Pre-Regulation 12 Consultation (February 2020)

- 4.1 For a six-week period between 21 February and 3 April 2020 the Council carried out public consultation on:
- A Draft Residential Conversions and Houses in Multiple Occupation SPD;
 - 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
 - The introduction of a Regulation 7 Direction to control the display of To Let Boards for residential properties.
- 4.2 The aim of the consultation was to carry out early engagement with stakeholders and provide an additional informal opportunity for comments on the draft SPD. The aim was also to gather feedback on the possible introduction of an Article 4 and Regulation 7 Direction to manage the concentration of small HMOs and To Let signs within the city of Lancaster.

Regulation 12 Consultation (August 2020)

- 4.3 For a six-week period between 14 August 2020 and 25 September 2020 the Council carried out public consultation on the Residential Conversions and Houses in Multiple Occupation SPD.
- 4.4 This formed the statutory consultation required by the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and sought to gain views on the content of the SPD.

5. How we have engaged

- 5.1 Table 5.1 outlines the consultation methods adopted for the Pre-Regulation 12 and the Regulation 12: Public participation stages, in order 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	<p>At both stages the Consultation Database www.lancaster.gov.uk/ppcl) consultees, Parishes and Councillors were notified on the opportunities to participate in preparation of the SPD.</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>
How those bodies and persons were invited to make representations.	<p>The Pre-Regulation 12 Consultation ran for 6 weeks, 21 February 2020 – 3 April 2020.</p> <p>The Regulation 12 Consultation ran for 6 weeks between 14 August and 25 September 2020.</p> <p><u>Consultation methods for both the Pre-Regulation 12 and Regulation 12 Consultation</u></p> <p>Emails sent to over 2,200 consultees on the planning policy consultation database, to Parish Councils and Councillors.</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'.</p> <p>A press notice was issued.</p> <p><u>Additional Consultation Methods for the Pre-Regulation 12 Consultation</u></p> <p>This included a period of publicity across the Lancaster District, with a Consultation Flyer and a public notice placed in the Lancaster Guardian (a local newspaper) following the start of the consultation.</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. This method was carried out in respect of the proposed Article 4 Direction to control HMOs and Direction under Regulation 7 Direction in Lancaster City, however the SPD consultation was also referred to.</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 Councils agreed publicity procedure.</p>

	<p><u>Additional Consultation Methods for the Regulation 12 Consultation</u> A presentation and Q&A via the Lancaster University Homes Webinar for landlords of student accommodation was held on 12 August 2020.</p> <p>Further details on the publicity methods are set out in more detail within Appendix A</p>
A summary of the main issues raised by the representations made	<p>The main issues raised in the representations are summarised in Sections 6 and 7 of this document and in Appendix A: Summary of Pre-Regulation 12 Consultation Responses and Appendix B: Summary of Regulation 12 Consultation Responses.</p> <p>The Officer response is set out in the Section 8 of this document.</p>
How any representations made have been taken into account.	<p>The Council has addressed the comments received and outlined how the comments have informed the final SPD.</p> <p>Sections 6 and 7 outline what issues were raised and Section 8 outlines how these issues have been addressed.</p>

6. What issues were raised at Pre-Regulation 12: Public participation?

- 6.1 Consultation on the Draft Residential Conversions and Houses in Multiple Occupation SPD provided the first opportunity for members of the public and interested parties to comment on the detail of the draft SPD. As the consultation related to the proposed SPD, Article 4 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. Several trends and patterns in respect of the draft SPD can be seen and are set out in more detail within this document.
- 6.2 The responses specifically in respect of the Draft Residential Conversions and Houses in Multiple Occupation SPD related to the following issues:

Support

- Significant support for limiting HMOs from permanent residents
- The policy to restrict HMOs is too late as concentrations are already high
- Shortage of family homes
- Landlords of HMO can get an overall combined greater rent than for family housing which pushes rents up at expense of the local community
- An over concentration of HMOs has harmed the local community spirit, there is no longer a balanced set of households
- Landlords live elsewhere and have no incentive to foster community spirit
- Properties stand empty over the summer
- HMOs have a significant impact upon the living conditions of residents
- Parking in the street is a problem, many HMOs have more than 1 car
- Large amount of waste, dumping of rubbish at the end of academic year by students and landlords

- Noise and antisocial behaviour
- Poor maintenance of some properties by landlords

Objection

- Disappointed at focus on students throughout the SPD
- The student population is not messy or noisy
- Students bring a large amount of expenditure and work to the local economy
- The student rented market under pins the Lancaster housing market, the coronavirus will create a recession on the housing market
- Student houses are maintained highly due to competition
- New purpose-built accommodation is expensive and does not replace the lower rent HMOs
- HMOs are an affordable source of accommodation for students – the increase in HMOs has improved the quality and supply
- Adverse impact on ability for residents to sell up, residents may be trapped, owner occupiers should be able to sell as a HMO
- The standards are too onerous and many properties both existing and new will not be able to meet these requirements

Comments on policy DM13 and implementation

- The HMO evidence base is inadequate and incomplete
- The 10% threshold should be applied flexibly to prevent an embargo on new HMOs and to prevent properties falling into disrepair or those which face demolition
- The 10% threshold will allow clusters – would it be better to calculate per street?
- The % cap should be on the number of residents within HMOs in an area
- The number of undergraduate students should be controlled rather than the type of housing to allow HMOs for post grads, young professions, those on short term contracts and families
- There should be no exception should be made if area already has over 10% HMOs
- How are exceptional circumstances assessed, a marketing exercise is suggested as long standing residents may wish to leave a street and struggle to sell
- Consider granting flexible uses class C3/C4 which would allow properties to change between each class
- The assessment should include ensuring increased occupancy does not increase flood risk to people, especially at ground floor

Standards for HMOs

- The HMO standards are backed by LU Homes (Lancaster and Cumbria Uni landlord accreditation scheme)
- The standards are much more onerous than current licencing standards
- Existing HMOs do not meet the standards
- Many properties cannot meet the standards, and they will prevent any conversions to HMOs
- Standards should be altered to allow 4 to share a bathroom, suggest cupboard, fridge/ freezer capacity per resident, desk space is not necessary for others than students

To Let Boards

- To many To let boards
- To Let boards not necessary with internet
- Unattractive and a blight the appearance of areas
- The paragraphs regarding signs are weak and should include the maximum sizes, and penalties for infringements

6.3 The responses specifically in respect of the proposed Article 4 Direction and the Regulation 7 Direction will be addressed separately when those proposals are progressed.

7. What issues were raised at Regulation 12: Public participation?

7.1. The consultation provided a second opportunity for interested parties to make comments on the content of the SPD. 11 separate responses were received. Many of the issues arising from concentrations of HMOs, outlined above, were reiterated.

7.2 The consultation responses highlighted the following issues in respect of the content of the SPD.

- The proposals do not control the quality of existing and new small HMOs, licencing should also be required for small HMOs
- Bedrooms at ground floor should also be prevented in flood zone 1
- The policy should only apply to HMOs with 5 or more bedrooms
- The 100m radius will not prevent over concentrations of HMOs
- The % should be altered to 5% in a 200m radius
- Criteria needs clarification to prevent subjectivity, reference to exceptional circumstances should be removed or made clear as landlords may interpret them differently to residents
- Encouragement to minimise signs is too weak, they should be banned

8. How these issues were addressed in the final SPD

1. Focus on students
2. Limiting HMO and the impact on market, quality, affordability
3. Evidence base
4. Flexibility and exceptions
5. Change how percentage is determined and type of control
6. Flood risk
7. Standards
8. Signs

7.1 As highlighted in Sections 6 and 7 of this statement, the Council received a range of responses to the content of the Residential Conversions and Houses in Multiple Occupation SPD. An explanation is provided below to outline how these issues have been dealt with in the preparation of the final version of the SPD.

1. Focus on Students
The references to student accommodation within the SPD have been reduced.

2. Limiting HMO and the impact on market, quality, affordability

The decision to limit the concentration of HMOs and 10% threshold within DM13 have been subject to consultation throughout the Local Plan process. Policy DM13 with the inclusion of the 10% threshold has been adopted by the Council. The Residential Conversions and Houses in Multiple Occupation SPD provides guidance on how the policy will be implemented, the aims of the policy and the 10% threshold have therefore not been amended within the SPD. The issues raised regarding limiting HMOs relate principally to the proposed introduction of an Article 4 area and will be addressed as part of the Article 4 process.

3. Evidence base

The evidence base intended to be used to determine the percentage of HMOs uses available data. This data consists of council tax exemptions, licensed HMOs (larger than 5 occupants) and a partial To Let sign survey. The comment regarding the data arises from an objection to the control of HMOs. It is acknowledged that this data is not complete but that it uses the most robust methods available. The data is, however, likely to underrepresent HMOs as not all HMOs are exempt from council tax, are licensed or will have had To Let signs in place at the time of the survey. Use of the data will therefore not prejudice the delivery of HMOs. If the Article 4 and Regulation 7 Direction are progressed it is intended to request that landlords notify the council of existing HMOs (currently not subject to licensing or planning permission) and carry out further To Let sign surveys.

4. Flexibility and exceptions

Policy DM13 refers to exceptions to the threshold and provides guidance on the issues to be considered. This allows flexibility where necessary. The SPD also refers to exceptions where existing residents may not be able to sell a property or where the living conditions of that property are significantly adversely affected by adjacent HMOs. Reference to a marketing period for a C3 use of 6 months has been added to address concerns raised.

The criteria for assessment and exceptions reflect the requirements of policy DM13. The impact upon amenity is a matter of judgement depending upon a range of issues such as the location and surroundings of the application site, the concentration of HMOs, availability of parking and waste storage. These assessments are made consistently by Officers of the Council not landlords, applicants or residents.

5. Change how the percentage is determined and type of control

The percentage and the way in which it is determined is included within policy DM13. It is therefore not within the remit of the SPD to change those details.

6. Flood risk

A section has been added to ensure additional sleeping accommodation within HMOs, at ground floor, does not increase risk to residents from flooding and that mitigation is put in place where necessary.

Where properties are in flood zone 1, they are at a low risk of flooding. Controls to prevent bedrooms at ground floor in these areas would be overly onerous and not supported by planning policy.

7. Standards and quality of HMOs

The standards within Appendix B have been transferred from Appendix D of the 2014 DMDDP. These standards have been in operation for a considerable period. They ensure that a suitable size of accommodation is provided where communal space may be limited and ensure that houses are not split into as many small bedrooms as possible. Where necessary they are applied flexibly.

Introducing licencing for small HMOs is beyond the remit of the SPD.

8. Signs

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 which allow/control To Let signs and the penalties for displaying signs contrary to the regulations have been added to the appendices of the SPD.

To Let Signs do not currently require consent. The SPD can therefore only encourage minimisation of their use. Separate action is being taken to control To Let signs further.

- 7.2 The means by which the number of HMOs is calculated has been altered from the Pre-Regulation 12 Draft SPD. The calculation now refers to an area with a radius of 100 metres, from the application site Unique Property Reference Number (UPRN) address point (Basic Land and Property Unit data in the Local Land and Property Gazetteer). This reflects how the data is stored and can be used. The separate methodology for flats has been removed.

Appendix A Summary of Consultee Responses at Pre-Regulation 12 Stage

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 should not be a need to use residential areas.
Resident	Support	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	Objecting	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	Objecting	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 e.g. waste, noise, parking, anti-social behaviour. The number of HMOs does 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 related 'to let' signage.
	Support	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.
Resident	Support	Support all three proposals and they need to be introduced asap.
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.

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 resident's views on the high density of HMOs and issues caused by these e.g. 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 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	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	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.
	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 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.
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	Objecting	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	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. Support the proposed restrictions on 'to let' signs.
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.
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.
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 e.g. 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	Object	Object to the proposed restrictions on HMOs. Purpose built student accommodation is the problem, social housing should be being built instead.

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 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 e.g. each agent should have one board on a street which lists all the houses they have to let on that particular street.
Resident	Support	Long overdue.
Resident	Support	Long overdue. HMOs can cause waste, parking, noise, and no maintenance issues.
Resident		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 e.g. 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	Object	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 creates 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 original 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	Support	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 does not 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	Comment	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 e.g. 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	Object	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 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	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 neighbourhoods. Students support and boost the local economy. HMOs are also used by young professionals. If graduates cannot 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	Support	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	Support	Covering email for Lancaster Labour Party paper responses.
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.
Resident	Support	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	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 with the exception of 'to let' signs.	<p>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 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 seem 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.</p>
Kendal Resident	Comment	Concerned that class C3 properties could be used for Airbnb 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	
The Planning Station - a town and country planning and development consultancy	Object	Concern re saleability in Regent Street. Bedroom floor areas seem excessively large. May lead to configurations to get around this, which may lower standards incurring unnecessary costs and use of valuable resources.
Lancaster City Council Officer	Support	Request to consider changing boundary to include St Georges Quay, Willow Lane and Marsh Ward.

Appendix B Summary of Consultee Responses at Regulation 12 Stage

Organisation (if applicable)	Support/Object/Comment	Summary of Comment
City Councillor	Support	High concentrations of student housing, seriously affect quality of life in the following ways: parking issues – not enough space for all vehicles creates double parking etc., noise disturbance - especially from late night parties, lack of social cohesion - due to the yearly influx of new students with no opportunity to develop long-term community connections, lots of people coming and going, problems with refuse - bins overflowing etc., fear that their house value will be lowered. Whilst the introduction of Article 4 (Policy DM13) may not help these particular residents, as ward councillor I would like to see tighter controls, so this serious problem does not worsen.
	Support	Concentrations negatively affect the character of our local community. There is already no shortage of student accommodation and the increase in recent years have limited the options for locals to find appropriate homes, and rapid changes in existing neighbourhoods dramatically alter the overall feel. Extensive changes to the architecture to convert properties to HMOs, make them stand out from the ones of identical style and it is difficult to capture the original theme once significant structural changes have been made. There needs to be a better balance between the HMOs and all year residents.
	Supporting / Objecting / Comment	Broadly supporting of document but how do you control the quality of existing and new small HMOs over time? I would like to see in licensing being required for small HMOs (as in other planning authorities). A small HMO is no less deserving of this level of quality assurance than a large HMO. Bedrooms at ground floor should be prevented in flood zone 1 as well as zones 2 and 3.
	Support	It is important that the number of HMOs is limited as there has been a huge increase in recent years. This impacts the area negatively in multiple ways - changing the nature of the local community from a mix of families/ long term residents and students/temporary lets to dominance of temporary lets. This causes issues with traffic congestion and parking, refuse and tipping in alleys, backyards and front yards of properties which has led to recent issues with vermin. extensions of properties which impinge on neighbouring properties and difficulties selling properties which are surrounded by HMOs. This is not a way to create and support sustainable local communities
	Comment	Conversions to HMO will increase fire risk on neighbouring properties especially if carried out in terraced areas. The consultation pre-dates the COVID epidemics but with hindsight it is not hard to imagine how HMOs will negatively increase the risk of epidemics spreading onto neighbouring residential houses. HMOs are increasingly offered for let on daily basis. This is akin to offering totally unregulated and untaxed hotel services in residential area. Controls over these types of let's should be considered.

Green Door Lets	Comment	<p>There is an assumption that HMOs are generally less attractive a proposition, which is too simplistic. There are high quality HMOs, with en-suite bathrooms and a high standard of decor and comfort which enable professional people on starting salaries to live in high-quality accommodation without the high costs of a flat. Sharing facilities is sociable rather than onerous. Young professionals also often want a more flexible tenancy, as they may be on shorter contracts.</p> <p>The policy should only apply to HMOs with 5 or more bedrooms, and/or those with shared bathrooms.</p>
	Comment	<p>There are still a large number of houses in our city, which are being used as multiple occupancy. It would help young locals if these houses were returned to be used as family homes, allowing families to move on expand and freeing up smaller houses for first time buyers.</p>
	Comment	<p>I think multi occupancy is a good thing for many people at some stages of life. However, I like the idea of not too many of these households in one area. When too many multi occupancy houses, it is harder to build communities.</p>
Morecambe Town Council	Comment	<p>The 100m radius would not prevent imbalances growing, a developer could propose a development of the 100% radius and an area of imbalance would grow. In dense areas of HMOs, areas where new HMOs are prohibited should be designated with an exclusion zone around them.</p>
	Support	<p>Welcome the proposals. All new HMOs should require planning permission. The criteria should be clarified to prevent subjectivity, residents may consider there to be a significant adverse impact which a landlord may not. Exceptional circumstances should be removed or made exceptionally clear. A HMO should not adversely affect parking. Encouraging minimisation of To Let signs makes it sound optional, they should be banned. The SPD should encourage landlords to keep their properties in a good state of repair. Landlords could contribute to improving visual appearance within the city, similar to the BID.</p>
	Comment	<p>Proliferation of HMOs is having an impact parking and on long term family residents by removing family houses from the market and changing the character of the area. The % should be reduced to 5% in 200m circles.</p>

Appendix C: 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

Methods	Main consideration
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 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 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.

Methods	Main consideration
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.